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Madrone Audubon Society
P.O.Box 1911
Santa Rosa, CA 05402
October 1, 2003

Bureau of Indian Affairs
Sacramento Area Office
Attn: 2800 Cottage Way
Sacramento, CA 95825

I am writing on behalf of the nearly 2000 members of the Madrone Audubon Society in Sonoma County. We urge you, in your responsibility to work with the Federated Indians of Graton Rancheria , that you allow environmental considerations to be part of the decision.

We have watched the Federated Indians of Graton Rancheria select first one prospective casino site in the San Francisco Baylands along Highway 37 near Sears Point, in the middle of an environmentally sensitive area and a major restoration effort. Twelve major environmental organizations of the Bay Area all objected to this first site. We have watched the Graton Rancheria then propose the casino siting beyond the urban growth boundary of Rohnert Park, again in an environmentally sensitive area of the Laguna de Santa Rosa, with issues of water availability, waste water treatment disposal, endangered species of plants and animals and a significant flood plain covering most of the parcel of land.

Our members want environmental review of any site selected as well as mitigation or relocation, whichever is appropriate.

Sincerely,

Diane Hichwa, Conservation Chair

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OFFICE OF THE
EXECUTIVE SECRETARIAT

Madrone Audubon Society
INCORPORATED

Secretary Gale Norton
U.S. Dept. of the Interior
1849 C Street, N.W.
Washington, DC 20240

To Secretary of the Interior Gale Norton:

I am writing on behalf of the nearly 2000 members of the Madrone Audubon Society in Sonoma County. We urge you, in your responsibility for granting the Federated Indians of Graton Rancheria a land trust, that you allow environmental considerations to be part of your decision.

We have watched the Federated Indians of Graton Rancheria select first one prospective casino site in the San Francisco Baylands along Highway 37 near Sears Point, in the middle of an environmentally sensitive area and a major restoration effort. Twelve major environmental organizations of the Bay Area all objected to this first site. We have watched the Graton Rancheria then propose the casino siting beyond the urban growth boundary of Rohnert Park, again in an environmentally sensitive area of the Laguna de Santa Rosa, with issues of water availability, waste water treatment disposal, endangered species of plants and animals and a significant flood plain covering most of the parcel of land.

We ask you to weigh the detriment to the surrounding environment as you consider accepting land in trust for the tribe. Our members want environmental review of any site selected as well as mitigation or relocation, whichever is appropriate.

Sincerely,

Diane Hichwa, Conservation Chair

P. O. BOX 1911 • SANTA ROSA CALIFORNIA 95402 • PH. 707.546.7492

MARIN CONSERVATION LEAGUE

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J. Scott Feierabend *Executive Director*

Patricia Sisco *Office Manager*

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For Immediate Release

Contact: Jana Haehl
(415) 485-6257
J. Scott Feierabend
(415) 485-6257

MARIN CONSERVATION LEAGUE TAKES AIM AT INDIAN GAMING FACILITIES

Appeals to Interior Secretary Norton to Ensure Compliance With Nation's Highest Environmental Statute

July 23 – San Rafael CA

The Marin Conservation League (MCL) today took aim at a proposal by the Federated Indians of Graton Rancheria (Tribe) to have the Department of Interior grant the Tribe 'sovereign immunity' over environmentally sensitive lands in the North Bay. The Tribe has announced its intention to develop an Indian gaming facility and a hotel adjacent to State Highway 37 in Southern Sonoma County.

By unanimous vote, the MCL Board of Directors went on record supporting the Tribe's goal to achieve financial self-sufficiency, but opposing "development of any large scale facility, including the proposed casino and hotel, on any portion of the Tribal Council's proposed location because of its impacts on the complex of environmentally sensitive baylands and associated uplands."

"This action," said MCL President Jana Haehl, "reveals the strategy that the Marin Conservation League will apply in this critical debate. After a careful, thoughtful and deliberative review of the legal and regulatory issues, MCL has chosen to deploy all available resources to ensure that any Indian gaming or other large-scale facility is subject to federal and state environmental law," Haehl continued.

"Analysis of existing law indicates that Indian gaming facilities are exempt from the National Environmental Policy Act of 1969 (NEPA), one of the Nation's oldest and most effective environmental statutes," said Haehl. "However, the Federated Indians of Graton Rancheria has stated its willingness to enter into a binding agreement that would make the site subject to full environmental review under NEPA. MCL intends to put pressure on them to do exactly that."

"The Marin Conservation League also strongly supports Senator Dianne Feinstein's bill to give the Secretary of the Interior discretion on taking lands into trust for the benefit of the Tribe. However, the legislative process is sometimes slow, and its outcome uncertain," Haehl noted. "That is why MCL has written directly to U.S. Interior Department Secretary Gale Norton explaining that "the potential environmental impacts flowing from the proposed gaming facility are so significant and so far-reaching that the U.S. Department of Interior, Bureau of Indian Affairs should enter into a legally binding agreement to prepare a full Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act of 1969...prior to taking any land for the project into trust."

"It is critical that the public and those opposed to the project fully grasp the significance of MCL's action," commented MCL Executive Director J. Scott Feierabend. He continued, "Insisting that Interior enter into a legally-binding and publicly enforceable agreement with the Federated Indians of Graton Rancheria and local land use agencies to require preparation of an EIS prior to the trust decision will provide MCL the legal backstop needed to challenge the environmental impacts resulting from an Indian gaming or other large-scale facility."

The Marin Conservation League has been working with concerned citizens since 1934 to preserve, protect, and enhance the natural assets of Marin County.

MCL is a grassroots organization that influences environmental policy through citizen action and education.

(4)

MARIN CONSERVATION LEAGUE

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David Weinsoff

J. Scott Feierabend
Executive Director

Patricia Sisco
Office Manager

July 23, 2003

Mr. Dale Risling
Central CA Agency
Bureau of Indian Affairs
650 Capitol Mall #8-500
Sacramento CA 95814

Re: Proposed Indian Gaming Facility in Sonoma County, California and the Need for Full Compliance with the National Environmental Policy Act

Dear Mr. Risling:

On behalf of the Marin Conservation League (MCL), I have attached several important documents regarding MCL's position on the proposal by the Federated Indians of Graton Rancheria (Tribe) to construct a gaming facility and hotel along State Highway 37 in Southern Sonoma County, California. These include MCL's position statement unanimously adopted by its Board of Directors on July 22, 2003; MCL's July 23, 2003 press release; and MCL's July 23, 2003 letter to Secretary of the Interior Gale Norton urging the Department to enter into a legally binding and publicly enforceable agreement between the Bureau of Indian Affairs and the Tribe, requiring preparation of an Environmental Impact Statement before the Department accepts trust title to any environmentally sensitive lands on the Tribe's behalf.

Please feel free to contact me should you have questions concerning this matter.

Sincerely,

J. Scott Feierabend
Executive Director

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ADMIN.
ROUTE (1) Rosalie
RESPONSE REQUIRED
DUE DATE
MEMO LTR (2) PH
TELE OTHER
Ed
Patrick

OFFICE OF THE VICE PRESIDENT
WASHINGTON

TO: Ms. Amy Keary
Executive Secretariat
Mail Stop 7229, Department of the Interior
18th and C Streets, NW
Washington, DC 20240

DATE: November 4, 2003

We are forwarding the enclosed constituent mail for your information. It is not necessary to send a copy of your reply to this office.

Should you have questions about these procedures or need to provide updated contact information, you may reach me by telephone at 202.456.9002 or by fax at 202.456.7044.

Sincerely,

Cecelia Boyer

Cecelia Boyer
Special Assistant to the Vice President
for Correspondence

696391

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J. Scott Feierabend
Executive Director

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VIA FEDERAL EXPRESS

July 23, 2003

The Honorable Gale A. Norton
Secretary of Interior
U. S. Department of Interior
1849 C Street, NW
Washington, DC 20240

Re: Proposed Indian Gaming Facility in Sonoma County, California and the Need for Full Compliance with the National Environmental Policy Act

Dear Secretary Norton:

The Marin Conservation League (MCL) is writing to express its deep concern about the potential environmental impacts resulting from an Indian gaming facility that the Tribal Council of the Federated Indians of Graton Rancheria (Tribal Council) has proposed for Southern Sonoma County, California. Since the Tribal Council first made public its intention to develop lands adjacent to State Highway 37, the proposal has been the focus of intense public debate and scrutiny. The MCL has made a deliberative and detailed analysis of the legal, regulatory and administrative issues in an effort to identify our options for meaningfully influencing the process in a way that protects the environment.

Our analysis concludes that the potential environmental impacts flowing from the proposed gaming facility are so significant and so far-reaching that the U.S. Department of Interior, Bureau of Indian Affairs (BIA) should prepare a full Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. § 4321 et seq., prior to taking any land for the project into trust.[1] Accordingly, MCL supports either (1)legislation that would clarify that the trust decision must comply with NEPA, or (2)a legally binding and publicly enforceable agreement involving the Tribal Council and BIA to require preparation of an EIS prior to the trust decision.

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[1] It is important to understand that MCL's position that the Department of Interior should conduct a comprehensive NEPA analysis applies to any project site that the Tribal Council may elect to pursue, and is not limited to the site in Sonoma County currently under consideration.

example, a wilderness area or a contaminated parcel in an industrially zoned urban area) with the condition after implementation of the action. The more stark the contrast, the more likely the impact should be considered significant. The impacts of the action must be considered at varying levels of context, such as the immediately surrounding area and properties, the locality, the region, and so on. To determine the "severity" of the impact requires the agency to consider a variety of factors: effects on public health and safety, the unique characteristics of the site, the likelihood that the effects are likely to be highly controversial, whether the action threatens unique or uncertain risks, the cumulative effect of the action added to impacts of other past, present, and reasonably foreseeable future actions, and whether the action has the potential to violate local, state, or federal environmental law.

The Tribal Council's Proposed Gaming Facility Will Have a Significant Impact on the Human Environment and Thus an EIS Should be Prepared Pursuant to NEPA

Although the Tribal Council has yet to propose specific site plans for the lands currently contemplated for the gaming facility in Southern Sonoma County, based on information provided by the Council and public sources, the project will clearly have a significant impact on the human environment and thus an EIS should be prepared for the project. For example, it is our understanding that the site harbors federally-listed species that would be subject to Section 7 consultation with the U.S. Fish and Wildlife Service pursuant to the Endangered Species Act. It is also our understanding that construction activities will likely impact wetlands – either directly or indirectly – and thus will require issuance of a Section 404 permit by the U.S. Army Corps of Engineers pursuant to the Clean Water Act. These are but two of several environmental issues that need to be assessed in developing the site and that point to the inescapable conclusion that an EIS should be prepared for the project.

The Department of Interior Should Comply With NEPA Before Accepting Into Trust Any Property on Behalf of the Tribal Council

NEPA's goals and the proper functioning of the process it creates demand that its searching environmental review be completed at the earliest point feasible in the process of approving an action. The NEPA process is designed to identify and address adverse environmental effects before they occur, to allow development of alternatives to the proposed action, as well as measures to mitigate the effects of implementing the preferred alternative. E.g., Sierra Club v. Peterson, 717 F.2d 1409, 1415 (D.C. Cir. 1983). Accordingly, it is essential that the NEPA process begin as early as possible in the life of the action before resources have

The Marin Conservation League, whose mission is to protect, preserve and restore the natural assets of Marin County for all, is one of the County's oldest environmental organizations. Founded in 1934, MCL is a grassroots membership organization that influences environmental policy through citizen action and education. We, therefore, have a vested interest to ensure that the federal government performs a full analysis of the project's environmental impacts prior to accepting into trust any property on behalf of the Tribal Council.

The National Environmental Policy Act of 1969

The National Environmental Policy Act, one of the landmark federal environmental statutes of the late 1960s and early 1970s, establishes as its purpose to inform the public and federal agency decision makers about the environmental implications of federal agency actions and to integrate environmental concerns into the design and implementation of those actions. NEPA requires federal agencies to prepare, prior to approval of agency action, extensive documentation of the environmental effects of that action and identification of measures to avoid those effects. The statute applies both to actions taken by federal agencies themselves and to actions taken by non-federal parties for which federal approval is required.

The touchstone of NEPA analysis is the action's significant effects on the quality of the human environment. 42 U.S.C. § 4332(2)(C). The NEPA process is geared toward the identification of such impacts and the formulation of mitigation measures and project alternatives that will avoid or moderate them. This typically involves a two-step process. First, the agency charged with carrying out the action may prepare an initial Environmental Assessment (EA) to determine whether the action will have significant effects. 40 C.F.R. § 1501.4(b). If the EA reveals the potential for even a single significant effect, or if the action's significant effects are so clear that no EA is necessary to identify them, the agency must prepare an EIS that evaluates the impacts in detail and proposes mitigation for them or alternatives to them. 40 C.F.R. § 1508.27; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1149 (9th Cir. 1998). An EIS must be prepared if "substantial questions are raised as to whether a project . . . may cause significant degradation of some human environmental factor." 40 C.F.R. § 1508.27(b)(4), (b)(5). Because the purpose of the EIS process is to inform the decision maker about the impacts of the action and to affect the environmental outcomes of the action if approved, the decision whether or not to prepare an EIS itself profoundly influences the eventual effect on the environment.

To determine whether a proposed action will have a "significant" environmental effect (thus requiring the preparation of an EIS), the agency must consider both the "context" and the "intensity" of the action's potential impact. 40 C.F.R. § 1508.27. "Context" involves an assessment of the impact's intrusion into the existing environment, comparing the baseline environmental condition (for the

been irretrievably committed and opportunities to implement alternatives and mitigation have been foreclosed. Particularly where an action involves multiple discrete federal agency approvals, early completion of the NEPA process is necessary to ensure that the decisions made by an agency early in the process do not foreclose options for mitigation or project alternatives that would otherwise be available to moderate the impacts of a later agency decision.[2]

These concerns clearly apply to NEPA compliance for the proposed Indian gaming facility in Sonoma County. Because the logical time for NEPA review in the facility development process is prior to a decision by the BIA to take tribal lands into trust, MCL's position is that application of NEPA at this early point is imperative. For this reason, MCL fully supports efforts – either legislatively or through the execution of legally binding agreements – to clarify that the BIA's decision to take land for the project into trust is discretionary and thus subject to NEPA.

The need for NEPA review early in the process is underscored by the fact that subsequent federal actions in connection with the project, such as a decision by the National Indian Gaming Commission (NIGC) to approve a management contract between the Tribal Council and the gaming operator, see 25 U.S.C. § 2711, would come too late and be too narrowly focused to provide an opportunity for comprehensive environmental review of the entire proposed project. By contrast, environmental review before the project site is taken into "trust" will enable decision makers and the public to consider the impacts of the gaming project while there is still flexibility to consider feasible alternatives and mitigation measures.

The Decision to Perform NEPA Review at the Trust Stage Must Be Legally-Binding and Enforceable

Reasonable minds may differ regarding whether BIA's decision to take lands for the proposed project into trust would be discretionary and therefore subject to NEPA. While the Marin Conservation League applauds the Tribal Council's expressed willingness to perform a full EIS on the proposed project, and to do so prior to BIA's taking the land into trust regardless of whether NEPA would otherwise require an EIS, we have concerns about how that process would function if application of NEPA were not legally mandatory. For instance, lacking a legally

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[2] Here, for example, it appears that development of a gaming facility at the site currently contemplated by the Tribal Council will, at a minimum, require consultation with the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, and the U.S. Environmental Protection Agency, and possibly the National Marine Fisheries Service and Federal Highway Administration.

In view of the foregoing, the Marin Conservation League urges the Tribal Council to enter into a legally-binding agreement with the U.S. Department of Interior (DOI) and the appropriate local land use agencies to fully comply with NEPA before the DOI accepts trust title to any lands on the Tribal Council's behalf. Pursuant to that agreement, the DOI would retain full discretion to approve, conditionally approve, or deny that action; and

The Marin Conservation League supports federal legislation requiring full NEPA analysis and compliance, including preparation of an EIS, prior to any environmentally sensitive lands being placed into trust.

MARIN CONSERVATION LEAGUE

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MARIN CONSERVATION LEAGUE

Statement on the Tribal Council of the Federated Indians of Graton Rancheria's Plans For an Indian Gaming Facility in Southern Sonoma County, California

The Tribal Council of the Federated Indians of Graton Rancheria (Tribal Council) has proposed to construct an Indian gaming facility, 200 room hotel, and housing on lands adjacent to State Highway 37 in Southern Sonoma County, California. Although the Marin Conservation League supports the Tribal Council's goal to achieve financial self-sufficiency, we oppose development of any large-scale facility, including the proposed casino and hotel, on any portion of the Tribal Council's proposed location because of its impacts on the complex of environmentally sensitive baylands and associated uplands.

In addition, the Marin Conservation League has determined that:

(1) The potential environmental impacts of a gaming or other large-scale Tribal facility, regardless of its location, may be significant;

(2) The National Environmental Policy Act (NEPA) provides the legal and administrative framework for analyzing the environmental impacts from proposed projects and provides for full public participation in that analysis;

(3) Current law may not require the Tribal Council to conduct a NEPA analysis prior to taking trust title to any property that may be used to site a gaming or other large-scale facility, but the Tribal Council has publicly stated that it is willing to subject its proposal to full environmental analysis;

(4) The most appropriate point at which the NEPA analysis should be conducted is in connection with the Department of Interior's action to take the property into trust; and

(5) Full NEPA review of any proposed Tribal facility will allow the Marin Conservation League, the public, and agency decision makers to understand the potential impacts from the facility, provide an opportunity for mitigation, and facilitate informed decision making.

To: Tom H. 6 130
for forwarding to CA

DEPARTMENT OF THE INTERIOR

TASKING PROFILE

ACCN #:	326887	**Status:**	C	**Fiscal Year:**	2004
Document Date 11/04/2003	**Received Date** 11/06/2003	**Due Date**	**Action Office** BIA	**Signature Level** AA	**Doc Source** WH

Addressee: Gale A. Norton

From: Pasion-Caiani, Elie

349 Westbrook Dr
Santa Rosa
CA 95401

Subject Text: Writes to Vice President Cheney in opposition of the Casino planned for Rohnert Park, California

Recommended Surnames:

Mail Carrier:

Mail Track#:

Cross Reference:

Copies To: ES

Status Tracking:

Correspondence Specialist: Akeary

Corresp. Specialist Phone: 208-3572

Closed Comments:

Signed:

(12)

OFFICE OF THE VICE PRESIDENT

WASHINGTON

TO: Ms. Amy Keary
Executive Secretariat
Mail Stop 7229, Department of the Interior
18th and C Streets, NW
Washington, DC 20240

DATE: November 4, 2003

We are forwarding the enclosed constituent mail for your information. It is not necessary to send a copy of your reply to this office.

Should you have questions about these procedures or need to provide updated contact information, you may reach me by telephone at 202.456.9002 or by fax at 202.456.7044.

Sincerely,

Cecelia Boyer

Cecelia Boyer
Special Assistant to the Vice President
for Correspondence

696391

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03 NOV -6 PM 5:30
OFFICE OF THE
EXECUTIVE SECRETARIAT

7

My name is (Print) Sienna Hornback

I live at 7378 Carrice ct, RP, CA

My telephone # is 707 665 0572

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Sienna Hornback Date 10-12-03

(5)

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Elie Pasion-Caiani

Address 349 Westbrook Drive, Santa Rosa, CA 95401

Signature Elie Pasion-Caiani

Date 10.6.03

My name is (Print) STEVEN YEAGER

I live at 8912 ~~[illegible]~~ CLOTHIER LANE, COTATI

My telephone # is 792 0702

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Steven H. Yeager Date 10/11/03

9

My name is (Print) DAVID CUMMINS

I live at 34 REGENTS CIR ROHNERT PK, CA 94928

My telephone # is 707- 664-9051

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature [signature] Date 10/12/03

My name is (Print) LISA RICCI

I live at 207 MENDELSSOHN CT COTATI

My telephone # is (707) 480 3824

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Lisa Ricci Date 10/12/03

11

My name is (Print) Andrea Woodcock

I live at 1949 E. Cotati Ave # 2835 Rohnert Park, CA

My telephone # is (707) 665-2526

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

My name is (Print) Pauline Wlodarczyk

I live at 7581 Bonita Ave. Rohnert Park, Ca. 94928

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Pauline Wlodarczyk Date 10-12-03

3

11-4-03

Assistant Secretary Martin,

I am writing concerning the proposed Casino near Rohnert Park Ca. I live less than a mile from this property. I think that this is the wrong location for any large scale development. Here are some of my bigger concerns.

Water Table - The local aquifer is already being depleted.

Flooding - All local roads are very flood prone, development would make it worse.

Farms - I see this land as much more useful as a farm.

Traffic - I would fear drunk drivers and no longer bike ride with my kids.

Wetlands - This is environmentally sensitive land.

We love our peaceful neighborhood. This is NO place to put a huge luxury casino. Please say NO to the Federated Indians of Graton and their Las Vegas partners!

Sincerely,

Carrie Crandall
4301 Primrose Ave.
Santa Rosa, Ca. 95407
707-586-1970

EXECUTIVE SECRETARIAT
2003 NOV 10 PM 1:00

November 10, 2003

Aurene M. Martin
Assistant Secretary of Indian Affairs
1849 C Street Northwest
MS-414 -MIB
Washington D.C. 20240

RECEIVED
2003 NOV 13 P 6: 32
EXECUTIVE SECRETARIAT

Dear Ms Aurene,

I would like to voice my opposition to the proposed CASINO that is planned by the Graton Rancheria in the County of Sonoma, adjacent to the City of Rohnert Park, on Stony Point Road, between Wilfred Avenue and the Rohnert Park Expressway.

My opposition is based on the following:

1. The proposed site is located on agricultural land that is shown in the County General Plan as a Community Separator – not zoned nor planned for high density use.
2. The site is in an environmentally sensitive area, adjacent to the Laguna de Santa Rosa.
3. The proposal would require public sewer service. The existing sewer treatment plant is not sized to allow the connection of a Hotel and Casino as proposed. The sizing of the plant is based on the current General Plans of the County and the Cities that are connected. None of these General Plans include a Hotel and Casino.
4. The proposal would require connection to a public water source. Water service to the City of Rohnert Park is through the Sonoma County Water Agency Aqueduct and from wells. Currently the City of Rohnert Park is using in excess of their entitlement in the aqueduct. There is no additional capacity for this proposal. Water wells are out of the question. The aquifer is already over pumped with the existing City of Rohnert Park wells being inadequate to supply the City.
5. The proposal would generate considerably traffic. The local roads are inadequate to handle this increase.
6. Studies from other states have indicated that crime increases after a casino has been placed in a community. This is a residential community. Increase in crime is not acceptable.

Sincerely,

Paul Schoch Pat Schoch

Paul and Pat Schoch
335 Sparkes Road
Sebastopol, CA 95472

October 17, 2003

Bureau of Indian Affairs
1849 C Street Northwest
Washington D.C. 20240

Greetings,

I want to register my protest to the proposed casino in Rohnert Park as loudly as humanly possible.

This kind of establishment in an urban area, near a college as well as other schools, is certainly not in the best interests of our children. The home owners in the immediate area (many with children), almost without exception, are totally against this casino in their neighborhood.

It also is not good for the small businesses in the area. Much of the time and money spent at the casino would have been spent at other places of entertainment, restaurants, etc. in the area.

The jobs it is supposed to create will be mostly low paying jobs and not enough to live in this expensive area.

It will put a further burden on the already crowded Highway 101 and the other streets in that area.

It attracts an element that will contribute to an increase in crime and other problems in the area.

This project is to be located on wetlands where there are many environmental issues. Why has this not been brought up?

Reports have been received from other areas where they have Indian gaming, and big promises were made of positive contributions to the community and not kept.

The majority of the people in the Rohnert Park area as well as Sonoma County are against this addition to our community. It is sad that the City Council of Rohnert Park has ignored the wishes of their own people, and Sonoma County Supervisors have done little or nothing to prevent it from happening.

I respectfully ask that you do whatever you can to keep this casino from coming to Rohnert Park.

Sincerely,

Pearl Burkart

Pearl J. Burkart
3236 Indian Rock Court
Santa Rosa CA 95404

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME RALPH J. FIRNENO

ADDRESS 1352 PARKWAY DRIVE Rohnert Park CA 94928-4746

SIGNATURE

DATE 10/04/03

·17

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
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I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Michele Fain

ADDRESS 5860 Gilmore Ave Cotati, CA 94931-9729

SIGNATURE Michele V. Fain

DATE 10/4/03

My name is (Print) Brigitte Grimshaw

I live at 523 Anson Ave.

My telephone # is 707-795-8683

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Brigitte Grimshaw Date 10/12/03

19

My name is (Print) SEAN MADISON

I live at 5245 McFARLANE RD.

My telephone # is 707 829 8526

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

20)

My name is (Print) Karen Hudson

I live at 7816 Medallion Way

My telephone # is 795-7859

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Karen Hudson Date 10-12-03

21

My name is (Print) Sharona ES

I live at 702 Racquet Club Circle R.P. 94927 out of area

My telephone # is (707) 588-8729

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

(22)

My name is (Print) Beth Field

I live at 4425 Acacia Wy Penngrove, CA 94951

My telephone # is 707-664-8514

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Beth Field Date 10/12/03

23

My name is (Print) Carol Kelly

I live at 7241 Camino Colegio Rohnert Park CA 94928

My telephone # is 707 795 6080

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Carol Kelly Date 10/12/03

(24)

My name is (Print) J Carter

I live at 14451 E Cotati Ave #3 Rohnert Park CA

My telephone # is (707) 292-3778

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature J Carter Date 10-12-03

(25)

My name is (Print) Jamo Kennemer-Washburn

I live at 339 Bonnie Avenue Rohnert Park CA 94928

My telephone # is (707) 792-0759

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 10/11/03

26

My name is (Print) Frances Hammond

I live at 839 Lightwood Ct

My telephone # is 707 7930287

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Frances Hammond Date 10/12/03

(27)

My name is (Print) Tim Hudson

I live at 7816 Medallion Way, Rohnert Park

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Tim Hudson Date 10/12/03

(28)

My name is (Print) Jeff Boyd

I live at 7272 Camino Colegio #48 - Rohnert Park, 94928

My telephone # is 795-8441

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jeffrey A. Boyd Date 10/12/03

(29)

My name is (Print) Julie Shidler

I live at 4705 Fairway Dr, Rohnert Park CA 94928

My telephone # is (707) 585-2001

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Julie Shidler Date 10/12/03

9/24/03

(30)

Dick Cheney;
please please, no casinos!
If you lived in our area, you would understand. Houses are going up like mad, on Stony Point Rd, traffic is a issue. As it is on Todd Rd, sometimes I stand a long time, just to cross the Rd, to get my mail.
Save the trees + cows what left. There will be crime among other things, this is suppose to be country out here, not a city.
we vote NO.

Vern & Marie Crabtree
769 Todd Rd
Santa Rosa, CA 95407-8067

(31)

9/20/03

~~Attn~~.

Dear Mr. Dick Cheney,

I strongly disapprove of the Casino planned for the city of Rohnert Park, CA

Thank you
Siobhain Bradford
Concerned Resident

Siobhain Bradford
7258 Alma Ave
Rohnert Park, CA 94928

enforceable agreement involving the BIA and the Tribal Council, it is not clear that the BIA would be willing to undertake, or even participate in, the preparation of an EIS if no environmental review were otherwise mandated by NEPA.

Such a "voluntary" EIS also raises questions about whether the content of the EIS and the opportunities for public participation and judicial review of the process and product would be the same as if the EIS were mandated by NEPA. Even if the EIS were the result of a contract between the Tribal Council and another party, and the Council waived any claim to sovereign immunity in that contract, the applicability of NEPA in the context of such a contract is by no means clear. For this reason, it is imperative that any voluntary decision by the Tribal Council to prepare an EIS be enshrined in a contract that would bind the Tribal Council and the BIA to preparation of an EIS according to NEPA's substantive and procedural standards and that such an agreement be enforceable by interested third parties.

Conclusion

On July 22, 2003, the Marin Conservation League's Board of Directors went on record as formally opposing "development of any large-scale facility, including the proposed casino and hotel, on any portion of the Tribal Council's proposed location because of its impacts on the complex of environmentally sensitive baylands and associated uplands," and supporting preparation of an Environmental Impact Statement before the DOI accepts trust title to any environmentally sensitive lands on the Council's behalf. The full text of that position statement is contained in the attachment, "Statement on the Tribal Council of the Federated Indians of Graton Rancheria's Plans For an Indian Gaming Facility in Southern Sonoma County, California."

We urge the DOI, the Tribal Council, and other appropriate parties to resolve this matter in a manner that squarely addresses our concerns about the applicability of NEPA to the proposed Indian gaming facility. The Marin Conservation League stands ready to participate in this effort and is committed to ensuring that the environmental values of any site selected for an Indian gaming facility are protected in perpetuity. Thank you, and we look forward to receiving your timely written response

Sincerely,

Jana Haehl
President

J. Scott Feierabend
Executive Director

Gale Norton
10/27/2003 06:10 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino in Solano County

Lydia H Zipp
<lhzipp@juno.com>
10/27/2003 06:08 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton,

As new residents of Fairfield, my husband and I are very concerned about the proposed Indian Casino in our new neighborhood.

Based on the effects that Indian Casino's have had in other areas we oppose the opening of a casino because of the negative impact that will most likely result in increased traffic and a decrease in the value of our home. There is also a known increase in crime in areas near casinos. There is already an unequal amount of police protection to balance out the amount of crime in Solano County.

We respectfully request that you do not let this prime agricultural land go into trust status that will allow for gambling in this area.

Thank you in advance for your consideration.

Sincerely,

Lydia Zipp & Rickey D. Zipp
4472 Rolling Meadows Ct.
Fairfield, CA 94534
(707) 863-0357

S. Bradford
7258 alma ave
Rohnert Park, CA 94928

Honorable Dick Cheney
Vice President of the United States
1600 Pennsylvania Ave
Wastington D.C. [redacted]
c/o Andrew Card, Jr.

✓#148

QC✓#004

Gale Norton
10/17/2003 01:38 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino/Rohnert Park

"Sue" <weliz@sonic.net>
10/17/2003 01:36 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

The Honorable Gale Norton
Secretary of the Interior

Dear Ms. Norton:

We, the undersigned, are 15 year residents ot Rohnert Park. Our City Council has signed a Memorandum of Understanding with the Graton Rancheria Indians for a Casino on the western edge of Rohnert Park, a family community. We are very opposed to this Casino being constructed in our neighborhood; it will have an adverse affect on a nearby mobile home park, will add traffic to already crowded streets, and is in direct conflict with the family-oriented community.

Please do not approve this proposed Casino; there are many other sites the Rancheria can buy which will not affect our citizens in Rohnert Park.

Sincerely,
Susan and Kurtis Webb
4855 Snyder Lane, Apt. 252
Rohnert Park

Gale Norton
10/15/2003 09:49 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino

WhiteFoxJ@aol.com
10/15/2003 09:49 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton,

Please, please,PLEASE do NOT approve any land trust for the Graton Rancheria Tribe in Sonoma County, California. The land is intended solely for a gambling casino that the majority of the local people do not want.

Jay L. Ward
711 Holly Ave
Rohnert Park, CA 94928

Gale Norton
10/17/2003 12:21 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I want my rights

Budsro@aol.com
10/17/2003 12:17 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton,
I am a citizen of Rohnert Park, California where the Graton Rancheria Tribe wants to build a gambling casino.
I think that the people should have a right to vote for or against this action. The City Council has given the Tribe the go ahead without the Tribe having
bought any property & have no land trust that has been approved by the Federal Government. The people should have a right to say what they want. I know
that the majority of the people are against building. Why should four people of the council make that big of a decision that we, the people, have to live with or make a move out of the area.
Our city is named the Friendly City. With the traffic congestion, alcohol, gambling & crime we will not be able to call the city a Friendly City anymore.
Please fight for the people.

Sincerely yours,
Rosemarie Walker
6077 Country Club Drive
Rohnert Park, Ca. 94928

Gale Norton
10/16/2003 11:27 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Graton Rancheria Casino

"nickpix" <nickpix@sbcglobal.net>
10/16/2003 10:56 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton,

I am against a casino being built in Rohnert Park primarily because of the affect it will have on our dwindling water supply. The majority of residents now pay for metered water rather than the previous flat rate. The city government recently sent a letter and information regarding water conservation to residents, complete with dye tablets to use to check for water leakage in our toilets. It is diffficult for me to understand how the city can acknowledge there is a growing water shortage problem and still support a casino. This would only add to the consumption problem and lessen the supply not only for Rohnert Park, but for surrounding communities.

I am also concerned with the disregard of most of Rohnert Park's city officals to the large number of residents against the casino. Several unwise spending ventures by recent city officials have depleted Rohnert Parks monies, and the casino income is a quick-fix. While technically not violating any laws, I am bothered that council members did not give equal time/recognition to community leaders opposed to the casino prior to their vote accepting the Graton Rancheria Tribe proposal on October 14, 2003. I also believe current legislation allowing Native American tribes sovereignty should be ammended regarding gambling concessions as it is far too easy for them to establish gaming establishments.

Respectfully,

Mary C. Thomas
4563 Harbor Lane
Rohnert Prak, CA 94928

37

Gale Norton
10/15/2003 10:16 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: proposed casino in rohnert park

"e. Tabunot" <etabunot@prodigy.net>
10/15/2003 06:48 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

839 Santa Dorotea Circle
Rohnert Park, CA 94928
October 14, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Hon. Secretary:

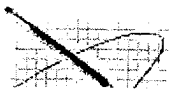
My wife and I who have been in Rohnert Park since 1975 are not in favor of the casino.

Please do something to stop it from happening.

Thank you very much.

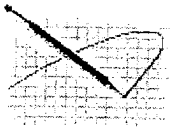
Very respectfully yours,

Val C. & Eva M. Tabunot



Gale Norton
10/29/2003 02:25 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I Oppose the Rohner Park Casino



"Peter Sultana" <petersultana@sbcglobal.net>
10/29/2003 02:00 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Secretary Norton:

I would like to register my opposition to the proposed casino in Rohnert Park. In my opinion, the establishment of a casino would bring in some short term income boost to the community, followed by years of physical and moral deterioration impacting most heavily on the impressionable youth who live here.

In my work, I see many patients who are suffering from addictions, and a good number of them have had problems with gambling. As you may know, this insidious illness tragically affects not only the individual suffering from it, but also the family, friends, and community.

Please do all that you can to stop this damaging business from starting here, and let's work on more wholesome businesses to support our community.

Sincerely,

Peter Sultana, MD

Family Medicine

6010 Commerce Blvd., Suite 152

Rohnert Park, CA 94928

39

Gale Norton
10/18/2003 04:46 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I oppose Rohnert Park California Casino

"Connie Sultana" <conniesultana@sbcglobal.net>
10/18/2003 04:39 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

To the Honorable Gale Norton:

I oppose the casino that Native Americans wish to build in Rohnert Park for the following reasons:

1. our water table is already low.

A 350 acre casino will adversely affect our water supply.

2. casinos are not known for lowering crime in neighborhoods.

We have already seen an increase in crime in the 3 short years we have lived here. I'd be really bummed to see it increase. I have a 6 year old child who I want to raise in a safe city. I thought this was it.

3. We have a deficit this year. Our City Council appreciates the money that the casino offers to help us offset this deficit and the problems the casino will bring the neighborhood. This reminds me of saying "It's ok to get this STD because you are rich enough to afford the treatment it will require." We have a deficit. We need to find a way of dealing with that. This quick fix casino is not the way. We will only have further problems to deal with.

4. Our freeway is already jammed with traffic.

The added casino traffic will kill us. Literally.

And on a philosphical note, I wish we could find a better way of paying back the Native Americans for the injustices they have suffered. Giving them this kind of work is an insult.

Please help us to keep this casino out of this area.

Thank you,
Connie Sultana
933 Hacienda Cirlce
Rohnert Park, CA 94928
707 588-8026

Gale Norton
10/17/2003 06:45 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino in Rohnert Park: residents oppose it

jennifer stewart <jenstew99@yahoo.com>
10/17/2003 06:44 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc: jenstew99@yahoo.com
Subject:

My name is Jennifer Seekon, and I have been a resident of Rohnert Park for 31 years. I'm sure you are aware of the situation that is daunting our city. We are being forced, by the city council and the Federated Indians of Graton Rancheria, to accept yet ANOTHER Indian Casino. Never mind the citizens of Rohnert Park overwhelmingly disapprove of a Casino in our city, the city council just this week approved a final Memorandum Of Understanding (MOA)between the city and the Fed. Ind. of Graton, but it seems that our council members are making decisions based on FEAR and money. Facing possible recall over their decision to accept the Casino, the city council has made statements to residents such as, "The city has no authority to approve or disapprove this project. We're putting together an insurance policy for the city and doing the best we can with the information we have."(Vidak-Martinez quoted after her yes vote.) Another council member, Nordin, says this after his yes vote, "It's a difficult decision. I'm not in favor of gambling but the Tribe has no intentions of moving. This council can't do anything about it, and remember, the city was close to bankruptcy." Yet another council member, Flores, states "The political realities are the state and federal statutes support sovereignty for the Tribe." He also talked a little about the River Rock casino in Geyserville and Thunder Rock casino near Sacramento, each of those cities refused to cooperate with the Tribes and have not been able to collect any sort of monetary rewards that had originally been offered to the cities. Is this sort of arm twisting going to be allowed? Our council is falling back on the poor us,routine. They are telling their residents that essentially, they haven't been given a choice. Either go along with negotiation with the Tribe and reap all benefits associated with its coalition, because they're coming no matter what.....or protest, refuse signing the MOA, and have a casino in our town that we don't want and have it cause havoc with congestion(which we already have now) increased environmental problems (sewer and water are also a major problem), and foot the bill ourselves (a near bankrupt town). This just can't happen. This is not the way to fix money problems plaguing our city, OR our state. We, the occupants of Rohnert Park need to be heard. WE DON'T WANT A CASINO IN OUR CITY. PLEASE HELP. I know the Tribe needs legal approval from the state and federal governments. Please help

our community find our true voices. STOP the institutionalization of Casinos in California, now.

I vote in ALL elections. I am a concerned citizen, not only for my community, but for my State. Do you think you would enjoy a casino at the end of your neighborhood? Ask the people around you the same question, because the way things are going right now EVERYONE will have a Casino in their neighborhood sooner or (later????).

Jennifer Seekon jenstew99@yahoo.com
7669 Melody Dr.
Rohnert Park, Ca. 94928 (707)792-5966

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Gale Norton
10/17/2003 01:19 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Gambling Casino in Rohnert Park, CA

"LORA SPAHT" <aaronsarmy4u@msn.com>
10/17/2003 01:17 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

My husband and I have lived and own a home in Rohnert Park for 20 years. We are definitely NOT in favor of a gaming casino in our area. We already have traffic congestion beyond belief. This is family oriented college town. Please NO CASINO!!

42

Gale Norton
10/16/2003 12:05 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Stop the Casino [Virus checked]

"Prudential " <prucalest@realtour.com>
10/16/2003 01:02 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject: Stop the Casino [Virus checked]

I thoroughly oppose the proposed Casino in Rohnert Park, CA. If the casino comes to our small town it will bring too much traffic, crime, possible prostitution and the dangers associated with too much gambling. This can only bring harm to our community.

Meg Sevrens

1223 Hummingbird Ct.

Rohnert Park, CA94928

[IMAGE]

Gale Norton
10/17/2003 11:04 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Proposed Casino

Marty Scott
<MartyS@gotsi.com>
10/17/2003 10:57 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I am firmly opposed, as are many in RP, to this proposed casino, for many reasons...social and environmental. I was asked by the Committee to Stop the Casino to write to you and add my name to the list of opponents.

Marty

Martha Hamilton Scott
216 Apple Lane
Rohnert Park, CA 94928

email: giantweenerdog@yahoo.com

44

Gale Norton
10/17/2003 02:46 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I am opposed to the casino in Rohnert Park [Virus checked]

"Grace" <gcschulman@sbcglobal.net>
10/17/2003 02:43 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject: I am opposed to the casino in Rohnert Park [Virus checked]

The Honorable Gale Norton,

I am writing to express my strong opposition to allowing the building of a casino in Rohnert Park. I've just moved here from Upstate New York. I searched for a long time to find a wholesome place to live. And within 3 months of my arriving here, I am horrified to find that there is a plan to allow a casino in my neighborhood.

Rohnert Park is a vibrant but peaceful residential area. Not to mention the logistical utility and administrative nightmare such a commerical project will cause to the area, a casino will bring in a crowd of undesirable elements who come here for cheap thrills and to exploit the area. I am greatly concerned for the safety of the children, the young and the old, and just ordinary folks who live here.

I am against allowing the tribes pick any place they like to build their money-making projects without regard to the rest of the population. If the tribe had been given the right to build their project within the state of California, let them find a place further away from existing residential areas. This should not be allowed to disrupt the wellbeing of the existing population.

Grace C. Schulman

~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Grace C Schulman
4949 Snyder Ln, Apt 89
Rohnert Park, CA 94928-4850
Tel/Fax: (707) 584-3029
Email: gcschulman@sbcglobal.net
~~~~~~~~~~~~~~~~~~~~~~~~~~~~

- winmail.dat

Gale Norton
10/16/2003 06:55 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Graton Rancheria

Jsaitone@aol.com
10/16/2003 06:52 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

To The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Secretary:

I am a concerned, tax paying parent of Rohnert Park. I oppose the proposed casino in our area. I don't believe that a casino would be good for our family oriented city. While the monies generated by the casino would be tempting if used to help out the schools and police, i still believe there are better ways of procuring funds.

The idea of more crime coming into our neighborhoods is alarming. I've seen enough drug deals in our nearby park, where my children have played since infants, to keep me away. I don't care to hear more gunshots and peeling out cars in the night.

The thought of further traffic problems unbearable and our water supply is already being stretched to it's limits.

I strongly oppose this casino to be allowed anywhere in Sonoma County. The families here don't need more exposure to that lifestyle. We currently have enough to struggle against.

Sincerely,

Janet Saitone
7866 Montero Drive
Rohnert Park, CA 94928

46

Gale Norton
10/15/2003 07:00 PM

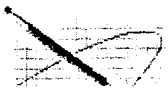
To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino

MMarianne <marogers@pon.net >
10/15/2003 06:54 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

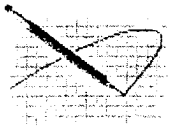
Dear Ms. Norton:

I am a citizen of Rohnert Park, CA. I moved to northern CA after living in the Los Angeles area since birth. I moved here because it has a gorgeous blue sky, a shade I had forgotten. There are many trees, open space and a great University in our city. As so many municipalities have struggled in this difficult economy, so have we. Our city council has one member with common sense, something lacking in so many these days. He is opposed to the Casino. Last evening, I attended my first council meeting. Attendance exceeded the capacity of our local performing arts center and many were left outside to listen. The council has held closed door meetings with the Graton Rancheria Tribe who are hoping to acquire 360 acres on the western edge of our city. I rarely use Highway 101 as traffic here has ballooned since I moved here. Santa Rosa is the next city north of ours and I travel there at least weekly. There are only 2 alternative ways there. One of them is Stony Point Rd. which is where the casino would be located. Another major issue here is water. The cost of water is skyrocketing and availability is declining. Much of this is due to the large amount of new housing built in Santa Rosa. I do not want to live in the next Los Angeles. I am disabled and living on a fixed income. I cannot afford to move as housing prices have soared. I urge you not to approve a land trust for this project. Thank you for your anticipated action.
Respectfully,
Marianne Rogers



Gale Norton
10/15/2003 04:34 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino [Virus checked]



"Judith Redding" <jredding@investrmi.com>
10/15/2003 04:38 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino [Virus checked]

The Honorable Gale Norton
Secretary of the Interior
Washington, DC 20240

I am writing you because there are many people, besides myself, who live in Rohnert Park who don't want the Graton Rancheria Casino to be located here. I'm very worried about the traffic, population and "gaming" impact a casino will have on our town, as well as promises not kept. Is it true that the casino is a "done deal?" I hope not.

Thank you for your attention in this matter.

Regards,
JudithRedding
Rohnert Park resident
707-585-1118

48

Gale Norton
10/27/2003 11:02 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park, CA Indian Casino

"Michael Poole" <mgpoole@hotmail.com>
10/27/2003 10:59 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I am writing to you to protest the building of an Indian casino in the Rohnert Park area. I have lived in Rohnert Park since 1974 and have raised four daughters here. This has always been a great place to live and raise your children. This will not be the case in the future if the casino is allowed to be built. We already have traffic congestion on Highway 101 and the casino will bring more. I also fear the kind of lawlessness that such a casino would bring. More drunken people, more desparate people trying to strike it rich on their last dollar, and the shady elements of prostitution, drugs, and the rest that gambling brings.

Our City Council has endorsed the casino but they wrongly and continually reflect their own desires and not those of the majority in this city. They are desparate to fill a financial gap caused by their inability to govern effectively. They are selling out the citizens of this city for a few million dollars. Their shameful behavior will backfire on them when they are recalled by the voters.

I urge you, as Secretary of the Interior, to oppose this casino in this location. Thank you.

Surf and talk on the phone at the same time with broadband Internet access. Get high-speed for as low as $29.95/month (depending on the local service providers in your area). https://broadband.msn.com

Gale Norton
10/16/2003 11:47 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: vote "no" for casino

my Nguyen <mylunguyen@yahoo.com>
10/16/2003 11:47 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I would not like any casino to be built in Rohnert Park because it is not good for kids and there will be a lot of crimes. Our water bills will go up and the citizens living in Rohnert Park would not like that.

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50

Gale Norton
10/16/2003 07:14 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

Yosemitejan@aol.com
10/16/2003 07:13 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc: Yosemitejan@aol.com
Subject:

Honorable Gale Norton:

As a 13 yr. Sonoma County resident, the past 4 being within the city limits of Rohnert Park, **I must express my opposition to the Graton Rancheria Tribe's proposed casino.**

The availability of water has been an issue for the citizens of Rohnert Park. The proposal of "the largest Indian casino in the bay area" will only continue to threaten the water issues, as well as environmental, traffic and public safety.

In light of the current state budget issues, the additional stressor of a casino being placed in Rohnert Park has caused my husband and I to consider leaving the State of California.

Please do not allow the purchase of the land and the building of the casino to occur. Gambling is outlawed within this state for a reason.

Sincerely,
Jan Myers
911 Dispatch Instructor / Homeowner

Gale Norton
10/16/2003 06:21 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

Terri Mueller <terri@goingplacesvacation.com>
10/16/2003 06:18 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton, I wanted to voice my opinion regarding the proposed Casino in Rohnert Park, California. I am **for** the casino if it will bring revenue to the schools in the area. It will be at the end of town where there are no or very few homes. Other residents are getting alarmed about nothing! If people want to gamble, they will find gambling; but the revenues from that go elsewhere now.

Terri Mueller
Going Places
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terri@goingplacesvacation.com
799-3176/1-877-300-6690

52

Gale Norton
10/16/2003 10:08 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino in Rohnert Park, CA

Jbjeans32@aol.com
10/16/2003 10:06 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I am opposed to the casino being built on the outskirts of Rohnert Park, CA. My husband and I made our home here because of the family atmosphere in the town. Building a casino will not only bring an element that violates the reason we and many others moved here, but statistics show it will eventually lead to increased crime and traffic. My research also shows that very few Indians benefit financially from the casinos in this state, only the big-wigs benefit financially, and get good health benefits.
How is it that land can be purchased, and imidiately eligible for "Sovereign Nation" status, when no Indians have lived there? Further more, non-Indians outnumber Indians on most "Tribe-owned" lands 8 to 1, so how can those areas be exempt from normal California laws? Does this mean that soon the Indians and the Nevada casino's can by the house next door to me, and turn it into a casino?
I have no objections to Indian's being able to support themselves, but why should they pick a method that is not welcomed by the people of this region. Our city council has agreed to work with the Tribe because they need money, not because the people they represent favore it. The people of this town are now trying to recall the city council over this issue (which of course costs tax-payers money).
Stopping this casino is the only way to keep the thousands of voters satisfied with the town, state and federal government.

Thank you for your time,
Katrina Moss

Gale Norton
10/25/2003 03:54 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino: An alternative point of view

Graham Lower <graham.lower@sbcglobal.net>
10/25/2003 03:52 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Honorable Secretary,

With little doubt you will not read this, having an aide read this instead because of the shear volume of mail this issue brings to your desk. However, I feel compelled to still voice my opinion and hope this does reach your eyes.

I am writing because I received a letter in the mail encouraging me and my fellow residents to flood you with requests to stop the casino that may be built near the city of Rohnert Park. Though my feelings on the casino are mixed, I do have strong feelings on this sort of blackmail, this declaration of "Assist us or pay the price of hoards of mean letters and emails".

In this letter that I received 5 points were enumerated as to why the casino was a bad thing. As I read them my mind drifted back to a class I took in college on fallacies, and I noted that not one of the points was truly valid nor logical. So before me, in the form of this letter, I had not one compelling reason to oppose the casino, but instead some cleaver marketing ploys that suited someone's political agenda. And because of this letter I assume that you have been subject to a multitude of letters based on irrational fears and simple manipulation.

In writing this I have only one intent. I ask that if you choose to support, or not support, the casino please do so on solid reason, not irrational fear. Do not let yourself be the pawn of another, but instead look at the facts and make an honest judgment based upon them. Do not succumb to the dishonest manipulations of someone who would feed upon the ignorance of others. In doing this you will at least make one man proud of his government.

Thank you for your time.

Graham Lower
Rohnert Park Resident

54

Gale Norton
10/29/2003 04:48 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: PLEASE HELP US STOP THE CASINO

"McIntosh, Margo" <MMcIntosh@ci.santa-rosa.ca.us>
10/29/2003 04:43 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

The Honorable Gale Norton,

Please help us to stop the casino from being built in Rohnert Park, California. We have a nice family town of about 39,000 people and a great majority of the residents, including myself don't want the casino to be built in Rohnert Park.

Your help would be very much appreciated.

Thank you.

Gale Norton
10/17/2003 11:01 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: RP Casino

Laurel McCarthy <zekemccarthy@yahoo.com>
10/17/2003 11:00 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I am a citizen of Rohnert Park, California, and strongly oppose a casino in our city. In addition to problem with traffic, sewar capacity and public safety, we are home to Sonoma State University. We strive for a friendly, family-oriented environment...this will be greatly harmed by a casino. I am also a teacher in the Cotati-Rohnert Park school district and I am concerned that the child who can least afford lost income and absent parents will suffer from the close proximity of a casino. The proposed buildings would also have a negative impact on existing hotels and the soon-to-be-built Green Music Center.
I am counting on you to do your utmost to see that this casino does not become a reality in Rohnert Park.
Thank you for your time,
Laurel McCarthy

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http://shopping.yahoo.com

56

Gale Norton
10/17/2003 07:32 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Please help our city

Terry Marshall
<TMarshall@jfcs.org
>
10/17/2003 07:34 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Honorable Gale Norton:

Rohnert Park is in serious trouble because Las Vegas and the Graton Rancheria Indian Tribe are working to build the large Vegas-style casino on 360 acres. The voters have been duped into passing a measure to allow the tribes to build casinos a few years ago. The measure did not inform us that landless tribes could secure any land as a reservation. I feel that some leaders are pushing the casino on Rohnert Park because they would prefer it to Graton's original site of protected wetlands. The casino will have impacts on our limited water supply, overused highway, and crime rate. Most serious is our water supply. We are getting our water from a nearby city. We have already been sued for overuse. The casino has proposed that they will drill their own well. This would cause our city serious water problems. Please help the residents of Rohnert Park. Many do not want the casino imposed on us. Our city council is turning a deaf ear on this communities opposition to the casino. The Tribe has millions of dollars to throw at the council. Unfortunately, we as residents, do not have this ability. I am in support of making reparations to the Indian tribes. But allowing them to take the 360 acre site on the outskirts of Rohnert Park would cause serious problems for our community.

Sincerely,
Terry Marshall
707-584-1814
6048 Diane Court
Rohnert Park, CA 94928

Rohnert Park, CA. 94928-2714

(707) 585-3525

57

Gale Norton
10/15/2003 07:10 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park

"J MacDougald" <jim@jimmacd.com>
10/15/2003 07:07 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

TO: The Honorable Gale Norton

As a home owner and small business owner in Rohnert Park, CA, I am writing to express my concern regarding a minority effort to thwart the efforts of the Graton Rancharia Tribe from establishing a Casino and Hotel in the SonomaCountycity of Rohnert Park.

Today I received a letter asking me to email you in opposition of the proposed establishment however; I would like you to know that I fully support the Rohnert Park City Counsel's decision to work with the Graton Tribe in establishing this Casino.

Please do not be swayed by the attempts of this extremist group should you be asked to decide on this matter.

Thank you for your time in reading this email.

Sincerely,

Jim MacDougald

6470 Meadow Pines Avenue

San Francisco, CA94104

Tel.: (415) 646-8425

Fax: (415) 835-9200

58

Gale Norton
10/16/2003 12:57 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: STOP THE CASINO in our City ROHNERT PARK

"Annelie Long - SF" <Annelie_Long@gmaccm.com>
10/16/2003 12:53 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I like to voice my opinion in regards to the Graton Rancheria Tribe not to get permission to build a Casino in our Town.

This is OUR City and we do NOT want any Indian Gambling Placein our Community.

We like to raise our Children and Grandchildren in our Town without gambling, more crime coming in to the Town and we certainly can do with all the Traffic Jams as bad as there are already.

We like our Children and Grandchildren to be able to go to School and not worry about gambling going on at the same Time right in our Community.

This would be a disgrace for Rohnert Park, PLEASE help and STOP the building of this Indian Casino.

We will signed any petition that will help STOP the Casino and we will ALL join the march on November 08, 2003 in order to get the government to see the problem a Casino will bring to our Community.

Thank you in advance, please do help and stop this madness.

Annelie Long

Portfolio Accountant

GMAC Commercial Mortgage Corporation

550 California Street, 12th Floor

may say.

Jennifer Line
4407 Hollingsworth Circle
Rohnert Park, CA 94928

Gremmie99@aol.com

59

Gale Norton
10/15/2003 08:27 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Graton Rancheria Casino-Rohnert Park, CA-PRO CASNIO

Jennifer Line

Gremmie99@aol.com
10/15/2003 08:26 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Ms. Norton,

I received a flyer in the mail today stating for people to e-mail, call, or write your office in opposition to the proposed casino. Well, I for one, am for the casino going in. These people do not speak for all of the citizens of Rohnert Park, there are many of us who do want the casino to go in, and do know that the Graton Rancheria Indians are a Sovereign Nation and can put it in anyway. We would like the casino to benefit our city as it will bring in many needed jobs and some entertainment. While I myself am not a gambler, though I have played in casinos a handful of times, it would also bring in a 5 star restaurant and other entertainment activities, which our community is definitely lacking in. The opposition says this is a friendly city, well, at the city hall meeting last night, they were anything but the friendly people they claimed to be, and in fact, the only problem people who were escorted out by the public safety officers were with the opposition. As you well know, the economic state in California is poor, and the revenue this would bring in to the schools, as well as the jobs it would create would definitely enhance our city. For a city that they say is so family oriented, there is nothing for children to do. I grew up here, and have been here for the past 26 years, so I know. Now, children wouldn't be allowed in the casinos anyway, so that isn't a problem. But the Graton Rancheria Indians want to help bring in other programs for our city and this would help the children these people claim to be doing this for. From what I have seen of the opposition, they are bullying people into supporting them. They tried to dissuade people from supporting the casino, by saying they would only bring in "Indians" to work and they would never hire them. This comment I heard was directed at a young African American man. I feel part of this is a racial issue with this community, not just one of wanting to protect their friendly city. They say that it will bring in crime, well, there already is crime here, though much of it is covered up and doesn't make it to the newspapers. They seem to think that because the Graton Rancheria Indians are a Sovereign Nation, that they do not have to abide by any federal regulations and think that they will serve alcohol to underaged persons. I find these accusation preposterous. The casino isn't going in to an area with children. There aren't homes that close to it. There is nothing else around where it is going in. For the most part, many of the citizens of Rohnert Park would never even need to drive past the area where the casino is to be located. In conclusion, I just wanted to let you know, that there are plenty of us who do want the casino to go in, and we do realize that with the Graton Rancheria Indians being a Sovereign Nation, it will go in, and we may as well benefit from it. Please, don't let this group of people speak for all of my city, as they do not speak for the majority of us, not matter what they

Gale Norton
10/16/2003 02:00 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Gaming Casino in Rohnert Park

"Dan Lezzeni" <engdanl@earthlink.net>
10/16/2003 01:57 PM
Please respond to engdanl

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I oppose the proposed casino in Rohnert Park, Ca. I have been a resident of this city for 20 years, and have watched the city council spend themselves into deficit spending for years. This a not well thought out, the city does not have the water supply, sewer capacity, or infrastructure to support a 350 room hotel and gambling facility on 300 acres of wet land on the outskirts of the city. I would like you to investigate this, talk to the Sonoma County board of supervisors and see that they are also opposed to this. Yet the city council is trying to get this pushed through with disregard to the county officials and the wishes of the people of the city. It seems to me and other occupants of this city that the city council is selling out to the Indian gaming board for tens years of payments to help balance the city budget. The city council has a recall movement against them, but they are trying to rush this through before an election can be held. I am asking that you look into this matter. Thank
you.

Sincerely, Dan Lezzeni

--- Dan Lezzeni
--- engdanl@earthlink.net
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61

Gale Norton
10/17/2003 02:46 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino

"Darlene Wells" <squeezi31@msn.com>
10/17/2003 02:42 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I am writing to let you know that I am opposed to the Casino coming to Rohnert Park. My husband and I choose to live here because it is a great family oriented city to raise our children in. I DO NOT want my children raised in a city with a casino. I don't want the additional traffic that will come to the already frustratingly jammed Hwy 101, or to the back roads like Stony Point that I take to avoid 101.

If I wanted to live near a Vegas style casino - I would move to Vegas. PLEASE listen to the residents of Rohnert Park, and not the city counsel. It is not fair that a small group of people can make a decision that is so widely objected to by the residents of Rohnert Park.

Bunches of Blessings,
Darlene
"If your dream doesn't scare you,
it's not big enough."
Cathy Lechner

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Gale Norton
10/19/2003 05:54 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: PLEASE STOP THE CASINO IN ROHNERT PARK, CALIFORNIA

62

Al Kottman <alwaysal2@yahoo.com>
10/19/2003 05:49 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

RECEIVED
2003 OCT 21 P 2:18
EXECUTIVE SECRETARIAT

October 18, 2003

RE: **AGAINST THE PROPOSED CASINO IN ROHNERT PARK, CA**

To the Honorable Gail Norton:

Against the expressed will of the overwhelming majority of its citizens, Rohnert Park Mayor and City Council have negotiated with the partnership of Stations Casino, Inc. and the Federated Indians of Groton Rancheria to establish a gaming facility in Rohnert Park (RP).

The memorandum of understanding (MOU) between the City Council and the partnership is legally non-binding. Promised, but not guaranteed, money is supposed to mitigate the negative impacts to our community of a 360-acre casino development next to our city.

However, it is clear from research into how casinos have affected other communities in California that the tribes will not pay anything close, if anything at all, to the true cost of all the negative impacts on the community.

- **Casinos can legally steal the water supply from the community, driving up water costs for the citizenry and driving down the real estate values in the area.**

The increase in crime and traffic cause an escalation of cost of police and auto insurance to be borne by the community.

- **Casinos have driven down property values of the residents, who cannot sell their homes for what they paid for them. Prospective buyers do not want to raise their family next to a casino, where drugs are sold and pandering of sex occurs 24/7. Ramona, CA is a prime example of how real estate prices tumbled.**

- **Since the Casino is not obliged to pay for its water and sewage, these costs must be borne by the citizenry.**

- **Studies show that 1½ jobs are lost for every gaming industry job that is created.**

Why are the city officials pandering to the Las Vegas Casinos? For Money? Please do all you can to stop the Gambling Industry takeover in Rohnert Park, California.

Sincerely,

Alfred Kottman

7343 Castille Ct

Rohnert Park, CA 94928

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Gale Norton
10/16/2003 11:38 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Stop the Casino 101

63

MKreager@chalonewinegroup.com
10/16/2003 11:36 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

To the Honorable Gale Norton,

I am writing to you to voice my opposition to the building of a casino in the city of Rohnert Park.

My family and I moved to Rohnert Park 25 years ago. I have seen Rohnert Park grow over the years as more and more people from the Bay Area have relocated to a smaller, more family-oriented environment.

Not only is a gambling casino a completely inappropriate facility to build in a small, college town, the environmental impact on Rohnert Park would be completely detrimental. Our traffic problems have worsened over the years as large, discount warehouse stores such as Home Depot, Costco, Walmart and Target have moved to Rohnert Park.

Crime and gang-related incidents continue to escalate as more people come to our town who normally would not stop in such a small community.

Rohnert Park has not planned for the usage of water in our community to go to a large casino resort, and this could impact our town adversely as well.

The City Council in Rohnert Park is attempting to negotiate with the Graton Rancheia Tribe by agreeing to not oppose the tribe's efforts to build their casino in our town. The City Council is not representing the town or long-time residents of Rohnert Park in this matter.

I oppose the building of a casino in my town and would like my voice to be heard.

Thank you,

Marina L. Kreager, PHR
Human Resources Manager
Chalone Wine Group 621 Airpark Road Napa CA 94558-6272
Phone 707-254-4233 Fax 707-254-4207
http://www.chalonewinegroup.com

64

Gale Norton
10/19/2003 03:57 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: (no subject)

Nancyandwalt9698@aol.com
10/19/2003 03:52 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

October 18, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

We have lived in Rohnert Park, California for 30 years, raising our family in a nice family oriented community. We oppose having the Graton Rancheria Tribe building a casino in this area. Highway 101 and Stony Point Road are already congested with traffic. We are also concerned about the environmental impact it will have on our community regarding water, their community obligations and our local dairy farmers. We are asking you to please not allow this casino to be built in this area.

Thank you for reading our e-mail.

Nancy and Walt Hyde
571 Lydia Court
Rohnert Park, California 94928

its impact to our community.

- Water is another serious issue. The city of Rohnert Park is under legal obligation to ensure control of water used by the city. A 350 acre casino resort is not part of the city or county water plan and will adversely impact Rohnert Park's water supplies and obligations towards waste management.

- Why is there a need for another Indian Casino in this area? There are currently 5 Indian Casinos within 1-1.5 hour drive of our community. They are the Hopland Shokawah Casino, the Twin Pine Casino, the Shodakai Coyote Valley Casino, the Cache Creek Indian Casino, and the Robinson Rancheria Casino. Most of these are located in a more rural setting and not a residential community.

As an active member of this community I am vehemently opposed to this casino and the negative impact that it will have on our community. My desire is that as Secretary of the Interior you will help a community where the majority of its citizens have outspokenly opposed this "done deal" despite the city councils efforts to ram it down our throats because of budget shortfalls. Thank you for your time.

Sincerely,

Kevin Hughes

1549 Monarch Place

Rohnert Park, CA 94928

(707) 795-6598

Gale Norton
10/16/2003 02:18 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: No On Indian Casino In Rohnert Park, CA

65

"Kevin Hughes" <hughes@ti.com>
10/16/2003 02:19 PM
Please respond to hughes

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Gale Norton,

I am a concerned citizen of Rohnert Park, California. I have lived in this community since 1989 and moved here because it was bedroom community that had many programs geared towards children. Up to this point in time I can say moving here was the best decision of my life. My children are growing up to be contributing and productive citizens. Like many communities we are dealing with the budget hardships that have caused cutbacks in certain adult and youth programs. Unfortunately our city's solution to this problem was to invite an Indian tribe to build a casino in town so that they can contribute to the city's coffers. Listed below are some of the points that a large majority of opposing citizens have a concern with.

- We are being told this casino is a "done deal" by our city council and as of this date the Graton Rancheria Tribe has yet to buy any property, no land trust has been approved by the Federal Government, and no Compact has been made with the State of California.

- Our city council members have developed a Memorandum of Understanding (MOU) in consultation with this tribe. In this MOU it states that the city will agree **not** to oppose the tribe's efforts to build in exchange for future promises of money. This MOU was completed without any formal voting by citizens. At the same time there is a clause that states that the city has to negotiate in good faith, upon occurrence of any other material change or event which affects the Tribe's expectations or bargains under the MOU. In essence the Tribe can reduce or eliminate any funds agreed upon at the initiation of the original agreement.

- Since this is a bedroom community the capital crime level is very small. The citizens of this city feel that a casino would introduce a higher level of criminal activity to the surrounding area. Both the Rohnert Park Police and Firefighters have spoken out against this casino and

Gale Norton
10/16/2003 02:42 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

66

Lisa E Howard <lisa.e.howard.cd3g @statefarm.com>
10/16/2003 02:37 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Hi Gale, I live and work in Rohnert Park, Calif. I wanted to share with you that I am strongly opposed to having an Indian casino in my community. I have grave concerns about how this facility will impact water usage, traffic conditions, crime, etc.

Please support the citizens you and your fellow politicians represent. The majority of RP citizens DO NOT want the Graton Rancheria Tribe to build a casino in Rohnert Park. Please do what you can to stop the building of the casino.

Thank you, Gale.

Lisa Howard
66 Regents Circle
Rohnert Park, CA
94928

Gale Norton
10/17/2003 01:08 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I oppose the casino in rohnert park california

67

hopley <hopley@earthlink.net>
10/17/2003 01:05 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

To: the office of Gale Norton

I wanted to voice my opinion in opposition to the proposed 350 acre casino resort the the Graton Rancheria Tribe and the Rohnert Park city officials are trying to build in the City of Rohnert Park. Please let my voice and vote be heard as 1 of many Rohnert Park citizens who do not wish our "Friendly City" to be impacted and our resources depleted.

Thank you for listening !!

Daniel E. Hopley
7340 Circle Drive
Rohnert Park, CA

resident of Rohnert Park since 1978

Gale Norton
10/29/2003 03:32 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino in Sonoma County

"Diane Hogrefe" <DHOGREFE@srm.stjoe.org>
10/29/2003 03:28 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Please, is there anything you can do to discourage the proposed Indian casino going into Sonoma County? I have loved ones who are compulsive gamblers, and it breaks my heart to think we will go into financial ruin with the opportunities that will be offered just around the corner. Of course, the rest of the community is also concerned about the potential rise in crime (we have a lot of undocumented illegals living here, who drink and drive without licenses/registration, and are involved in hit and run accidents already). Not to mention the impact the increased traffic will have on our pastoral setting . . .Thank you in advance, for looking into this concern of mine, to see if there is any way to not allow the casino to go into Sonoma County. Sincerely, Diane Hogrefe, 1137 Putney Drive, Santa Rosa, CA 95401

Gale Norton
10/19/2003 12:11 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Please support Rohnert Park CA casino

69

"Robert R. Hoffman" <bhoff@jps.net>
10/19/2003 12:07 PM
Please respond to "Robert R. Hoffman"

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I urge you to please support the Graton Rancheria Tribe plans for a Casino in Rohnert Park. CA.

Robert Hoffman
Rohnert Park, CA

Gale Norton
10/16/2003 12:17 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject:

Jim Hibbs
<jim@thehibbs.com>
10/16/2003 12:15 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

70

Dear Ms. Norton,

Last Tuesday night the City council of Rohnert Park, California in a very unwise vote approved an memorandum of understanding with the Graton Rancheria Tribe to not oppose a gambling casino in our community. The majority of our city do not approve of this decision.

Although, the casino is not within the city limits now, if built and operating it will have a detrimental effect on our family, residential area.
Rohnert Park is a family residential community and even advertises itself as such. We are not in close proximity to resort areas where such a venture is more appropriate.

This casino will affect our roads, water, police and fire services not to mention increases in crime, alcohol consumption etc.

Our roads and particularly US Hwy 101 are already at a standstill for most of day. Water is scarce and resources for same are seriously diminished do to the already overbuilding that has been allowed.

Further, the casino proponents claim it will bring jobs to the community.
Maybe for others commuting to our area, which will further clog our highways and surface streets and increase pollution. The jobs promised will not be high paying jobs. Indeed, the median price of a home in our area is $426,000. I doubt if any of the jobs created will offer income to qualify for such a loan.

To close I urge you not to grant any authority of your office to allow this casino to be built.

J. Hibbs
PO Box 892
Rohnert Park, CA 94931

Gale Norton
10/17/2003 10:50 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino in Rohnert Park

71

"Jim & Kathy Hellfeier" <hellfire@pon.net>
10/17/2003 10:51 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Ms. Norton,

My name is Jim Hellfeier and I live in Rohnert Park where they are in the process of building a new Casino and I would like to tell you that my wife and I oppose this action. I was born up the road in Santa Rosa and when Kathy and I married and talked about starting a family we settled on Rohnert Park. We liked the community atmosphere and the fact it seemed to be built for families with parks and schools in each neighborhood. The other part we enjoyed was the open space around the city and the small town feel. I would hate to lose all the reasons we live here and have a large casino and hotel move in. We have a small university and do not believe that the students need to have gambling and drinking 1 1/2 to 2 miles from their dorms. I ask you to say "no" to the Graton Rancheria Tribe and keep Rohnert Park a family community.

Thank You for your time and consideration.

Sincerely,

Jim & Kathy Hellfeier

Gale Norton
10/19/2003 01:07 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino in Rhonert Park, CA

James Haug
<hijklhaug@astragate.net>
10/19/2003 12:51 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

72

Dear Secretary Norton,

I do not like what I am seeing here in California. The Indian tribes and outside gambling interests are putting casinos all over the state.

I am totally against gambling. I think it is bad and I do not want to live in a place where people may freely gamble and where it is encouraged because too many people get hurt by it, many of them innocent women and children.

By what right are they able to do this when other businesses may not?

The legislature can encourage the tribes with incentives to start productive businesses which actually make something useful.

Senator Feinstein and Representative Wooley are introducing legislation which gives you the power to stop them.

Please redirect these people now before our communities fall prey to casinos.

Respectfully submitted,

--
James Haug
7886 Washington Avenue
Sebastopol, California 95472
USA

Gale Norton
10/20/2003 01:49 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino Opposition

73

Marcia Harrigan <marcia.harrigan@SONOMA.EDU>
10/20/2003 01:48 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

RECEIVED
2003 OCT 21 P 1:18
EXECUTIVE SECRETARIAT

the Honorable Gale Norton
Secretary of the Interior

I have never expressed my opinion to a federal official before. I have always felt in the past that my input would never make a difference. Now with the state of affairs in California, I want to speak up.

I wish to express my TOTAL OPPOSITION to the proposed Indian casino to be built in Rohnert Park, California. The City of Rohnert Park has for years been warning the residents about the shortage of water in the aquifer. The Graton Rancheria tribe should not be able to buy land that would further limit water in the local community.

I also oppose the casino becuase the city counsel is not listening to the residents they represent. Please do not allow the sale of the property to the Indian tribe to be completed. As a sovereign nation they have already shown they are not cooperative with state and county codes and will build whatever they perceive as acceptable.

I will support Diane Finestein in her effort to change the laws.

Sincerely,
Marcia Harrigan

Gale Norton
10/16/2003 12:11 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Graton Rancheria

"Harbour, Susan" <SHarbour@co.marin.ca.us>
10/16/2003 12:06 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

74

The Honorable Gale Norton,

I live in Rohnert Park, California, where the Graton Rancheria Tribe of Indians plan to build a huge gambling casino. Absolutely no environmental or traffic studies have been conducted. I totally oppose turning out lovely area into a modern day "Potterville" (from the movie, "It's a Wonderful Life") . Please help.

Susan Harbour
Marin County IST
(415) 499-3797
sharbour@co.marin.ca.us

Email Disclaimer: http://www.co.marin.ca.us/nav/misc/EmailDisclaimer.cfm

Gale Norton
11/05/2003 02:07 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Indian Casino

75

Matt Hannon <matman@callatg.com>
11/05/2003 02:03 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

The Honorable Gale Norton
Secretary of the Interior

My family and I oppose the proposed Indian Casino adjacent to the city of Rohnert Park, Sonoma County, California.

Like most of the Indian Casinos, only a few people will benefit. The horrendous traffic, water supply, and sewer disposal is already a problem for the area. Why add more problems? The Graton Rancheria Tribe was resurrected just for selfish financial purposes.

We live in Sebastopol within 4 miles of the proposed casino. The majority of the people in Sonoma County oppose it. Indian casinos built on new land was made possible by an obscure amendment that the voters unknowingly passed.

Please do all you can do to stop this and all Indian casinos.

Sincerely,

Matthew & Mary Hannon
4100 Blank Road
Sebastopol, CA 95472

Gale Norton
10/19/2003 06:15 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

DANIFCAL@aol.com
10/19/2003 06:12 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

76

RECEIVED 2003 OCT 20 EXECUTIVE SECRETARIAT

Dear Ms. Norton,

I own and live in Rohnert Park CA where the Granton Rancheria Tribe casino will be built. I am very upset with this decision. As I taxpayor and owner I do not want this casino in a bedroom community. Yes, the reason I live living here is its a family bedroom community. I as single but love the concept and opportunity to have one day a family to live in Rohnert Park.

Instead of the council accepting the agreement with the tribe - how about the voters in Rohnert Park. If my neighbors want the casino, fine I will accept
it as community decision. Is this possible?

Thank you for your time.

Danielle Flynn

Gale Norton
10/16/2003 05:08 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: I'am totally against A CASINO NEXT TO ROHNERT PARK!!!!!!!!

77

"Kimberly Fields" <myjoly16@msn.com >
10/16/2003 04:59 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear gale norton, how abusive of the Graton Rancheria Tribe!! what were they thinking? when they want to invade in a community, cause havoc on all local hard working business owner's? And to top that off seize our water supplies? This sounds to me like war with many local merchants and families who oppose the Rancheria tribe to impose on a community that has'nt had restrictions or threats of taking over our Rohnert Park town. And I believe that not only will the community suffer with a casino in our town by possible fatalities and don't forget our water supplies, more vandalism occurance, more traffic and really we don't need more traffic in a small town (that is growing). Business owner's would be in competion with a casino and there's no gaurantee that slot winner's or high roller's will spend their money in Rohnert Park but if you think about that really there would be no concern of this anyway if there never was a casino anyhow! Rancheria Tribe can bale out now while their ahead and if they own this land that they propose to build on well in their best interests they could contac the government and work somekind of payoff! this way there will be no hard feelings with either party and the Rohnert Park population wont have to make adjustments with their commute, or bank account's. And most importantly the city's water supplies and survival of local business owner's and last but not least but there's probably more that can be said but what if more road work occurred? there's another expense. If the Rancheria Tribe did build on this land because they say it's their's, and they promise all sorts of promise's to pay for this and that, (well a casino in Rohnert Park would not be successful) sure lots of jobs but customer's have to support those job's! My opinion is is that a casino belongs really way out of town and near tourist's attractions. People can find casino's in the lake county area and other counties that are next to tourists attraction's. If there is gambler's out there fine and I'll bet that they never complain about how far they have to travel to gamble. PLEASE NO CASINO!!!!!!

P.S. FAMILIES DO NOT NEED HARD TIMES WHERE THEIR HOME AND HEART IS!!!!!!

Sincerely, Kimberly Fields
e-mail myjoly16@msn.com

Gale Norton
10/18/2003 02:14 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Stop the Casino

"caewer"
<caewer@Sonic.net>
10/18/2003 01:51 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Gentlemen:

Please put me on record as being opposed to the construction of the Graton Rancheria in the Rohnert Park area.

Respectfully, Douglas M. Ewer

4307 Fairway Drive
Rohnert Park, CA 94928
e-mail: caewer@sonic.net

Gale Norton
10/20/2003 11:21 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park, CA. City Council Indian Casino Crimes

79

"Duquette, Alan" <ADuquette@dynatex.com>
10/20/2003 11:02 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

RECEIVED
2003 OCT 21 P 1:18
EXECUTIVE SECRETARIAT

Honorable Gale Norton,
I will keep this email brief and to the point regarding the Rohnert Park City Council and their illegal dealings with the Graton Indian Casino project. The entire City Council, bar one, has taken a dictator-parental stance in working out a deal with this Indian tribe without actually representing the voice of the people of Rohnert Park. The right thing is to put it up for a vote. As a active community member and registered voter I find this loose cannon council a disgrace, that have as their only motivation, their own personal financial gain. If there is enough reason to enlist the Grand Jury in determining how this "business dealing" came to be, I support that investigation. Below is a list of "Indian-business" people sending mail as, Citizens of Rohnert Park for good jobs, Better Schools, and Safer Neighborhoods (what a joke!):

Hugh Codding, famous land-pimp developer
Vern Smith, former Rohnert Park Council member
Greg Gunnheim, President, Lake Sonoma-Mendocino County Building Trades
Patricia Cassinelli, Rohnert Park Senior Advisory Commission (Need bad advice? She's you girl!)
Len Carlson, Rancho Grande Homeowners Association

As a citizen, I demand representation, not criminal activity by the Mayor, and the City Council. I'm also against annexing non- reservation land, as new Indian Casino Reservation Land.

I request your help in this fundamental matter of democracy and misuse of power by the city government of Rohnert Park.

Sincerely,

Alan Duquette, phone#: (707) 584-0591
6081 Evelyn Ave.
Rohnert Park, California. 94928

Alan Duquette, CQA
Quality Manager
Dynatex International
5577 Skylane Blvd.
Santa Rosa, CA. 95403
(707) 542-4269 x222

Gale Norton
10/17/2003 04:17 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: No Casino

80

JDennis <jadennis46@yahoo.com>
10/17/2003 04:13 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

I would like to be heard on the issue of trying to construct a casino in Rohnert Park, California. Not only is this bad for our neighborhood, but environmental impact, traffic conjestion and adversely impact Rohnert Park's water supplies and obligations. The politicians are there for the money and we are not for sale.

NO on a casino in Rohnert Park, CA

JoAnn Dennis
1425 Parkway Dr
Rohnert Park, CA 94928

Have a great day!

Do you Yahoo!?
The New Yahoo! Shopping - with improved product search

Gale Norton
10/16/2003 07:08 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: NO on Casino

81

SALDENICOLA@aol.com
10/16/2003 07:07 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

No on casino, Rohnert Park resident for the last 20 years.

Sal

Gale Norton
10/16/2003 03:02 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: message

82

Helena Dante <hdante@sbcglobal.net>
10/16/2003 03:00 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Re: CASINO IN ROHNEWRT PARK: ''' NO" .

HELENA DANTE.

Gale Norton
10/17/2003 07:52 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Indian Casino

83

"Jenifer" <jacrab@pacbell.net >
10/17/2003 07:50 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Secretary Norton,

I do not believe that it is in the best interest of my over crowded community to bring a large Indian gaming complex to Rohnert Park. The city council will do anything for money and is not listening to the people.

Thank you for listening.

Sincerely,

J. Crabtree

Gale Norton
10/16/2003 04:41 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

84

"Lowell Chaput" <lowell@sonic.net>
10/16/2003 04:40 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Honorable Norton,

I am writing to you to ask you to please help us stop the proposed casino in Rohnert Park, California. We do not need this type of facility in our city. This is a very family-oriented town, who prides itself in offering many children-oriented activities. A casino does not fit! Other issues of concern are water supplies and traffic problems, not to mention achohol-related activities that come with casino patrons.

I urge you to please stop this casino from happening!

Sincerely yours,

Linda and Lowell Chaput

1425 Montana Place
Rohnert Park, CA 94928

(707) 795-0429

Gale Norton
10/24/2003 02:53 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino proposal

85

"Stephanie Chalmers" <chalmers@ap.net>
10/24/2003 02:50 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Honorable Gale Norton,

I am writing to urge you not to grant the land adjacent to Rohnert Park (California) to the Graton Rancheria Native American Tribe for their proposed Casino resort. Though I support their right to public land, I believe that the presence of a 350 acre resort in this county would be environmentally unsound. Our water and sewage systems are already overtaxed. Our streets are already congested and our air quality continues to deteriorate as the population grows. This once beautiful semi-rural county would be at further risk with the addition of the Tribe and the tourists that the casino would attract.

Thank you for your attention,

Stephanie Chalmers, DVM

RECEIVED
2003 NOV 13 P 5:40
EXECUTIVE SECRETARIAT

Gale Norton
10/29/2003 01:01 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Graton Rancheria Tribe Casino

c86

<jenoc@msn.com>
10/29/2003 12:51 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

The Honorable Gale Norton,
I oppose the Indian Casino in Rohnert Park because it will affect our water, increase traffic, and increase crime. Casinos should not be located next to a city.
Sincerely,
Jean Chalmers

Gale Norton
10/16/2003 11:35 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Casino in Rohnert Park, CA

87

"PCarra" <pcarra@intergate.com>
10/16/2003 11:31 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Ms. Norton,

Our family, like many others here in Rohnert Park, appose the construction of the Graton Rancheria casino and feel that we have been given no voice in this matter. We ask that you do all you can to stop this construction and allow the people of Rohnert Park to have a say in their own destiny.

Thank you for your consideration
Philip J Carra
pcarra@intergate.com

Gale Norton
10/16/2003 01:37 AM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: STOP THE CASINO IN ROHNERT PARK

88

Cindymburkhardt@aol.com
10/16/2003 01:34 AM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear Honorable Norton,

I am writing to voice my concerns regarding the proposed casino the Graton Rancheria Tribe is trying to build in Rohnert Park, California. I believe this casino would be a huge detriment to our community. The wells in the area would dry up, there is wetlands in the area, and the protected salamander has also been found in the area they wish to build this casino. I don't believe a casino
belongs in an urban area. The traffic in Sonoma County is presently out of control, the impact of a casino (where they have predicted up to 10,000 to 20,000 visitors a day) would cause such deadlock on our roadways, you would not be
able to go to the store without sitting in traffic for an unreasonable amount of time.

Another big concern is the crime, prostitution, drugs and addictions a casino will bring with it. I am raising a 17-year-old son, and don't want him enticed by a casino so nearby. Also, I understand that they would sell alcohol 24
hours a day--which would make the roadways full of drunk drivers--24 hours a day!! You could be hit by a drunk driver on your way to work!! As I work in the
Sonoma County Probation Department, I know that gambling, alcohol, drugs and crime go hand in hand. I beg of you to hear the voices of all the citizens who are opposed to this casino. I have yet to meet anyone in this county who is in favor of such a casino. I feel the Rohnert Park City Council is not looking at the whole picture. They have mismanaged the City's finances for years, and think this will get them out of the hole they have dug for themselves. Unfortunately, they don't realize the impact it will have on our fire and police
departments, the environment, sewage system, water, etc. Thank you for allowing me
to voice my concerns.

Sincerely,

Cindy Burkhardt
An extremely concerned citizen

Gale Norton
10/31/2003 12:32 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Santa Rosa Press-Democrat reports" Station Casinos bullish on gaming plans for RP"

89

"J. Boyle" <jboyle@pon.net>
10/31/2003 09:59 AM
Please respond to "J. Boyle"

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

October 31, 2003

Dear Secretary Norton:

Sonoma County's largest newspaper reports today that Station Casinos sees profits in my city. That mustn't happen.
The last President to attempt guns and butter during an even smaller war than we are fighting now was LBJ. I saw him
burn down to the point that he had to stay on military bases to get a single handshake.

Sincerely,

Joseph C. Boyle
1372 Mattice Lane
Rohnert Park,CA 94928
707-792-1819
jboyle@pon.net

Gale Norton
10/16/2003 06:30 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Fwd: Stop the Casino in Rohnert Park California

90

Stevebosshard@aol.com
10/16/2003 06:29 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

```
Return-path: <Stevebosshard@aol.com>
From: Stevebosshard@aol.com
Full-name: Steve bosshard
Message-ID: <75.1b023faa.2cc073e2@aol.com>
Date: Thu, 16 Oct 2003 18:21:22 EDT
Subject:  Stop the Casino in Rohnert Park California
To: gale-norton@ios.doi.gov
MIME-Version: 1.0
X-Mailer: 8.0 for Windows sub 6021
Content-Type: multipart/alternative;
boundary="part2_de.3f68cdeb.2cc073e2_boundary"
```

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Ms. Norton,

I am one of the over 4,000 persons that signed a recent petition being circulated in Rohnert Park California in opposition of a casino being built on our city boundaries. The casino is funded by Station Casinos of Las Vegas, Nevada a gambling interest using a recently formed native american tribal group as a front to purchase property and build a huge casino, restaurant and 500 room hotel on our city boundaries.

This tribe, the Graton Rancheria Tribe, was formed in 1999 and their leader Greg Sarris at the time of the approval and to get the approval stated his tribe would NOT build a gambling facility. He further stated that gambling was a blight on the Native Americans.

Now only three short years later he has attempted to build a mega casino on 2000 acres of wetlands on Highway 37 and once that was rebuffed turned his attention to our small city. We are a town of 40,000 plus people straddling Highway 101, 50 miles north of San Francisco. We are basically a bedroom community with a real estate developer named Jimmie Rogers controlling the city council.

Rogers owns four of the five council members and had them work out a back room deal called an MOU with the tribal council, which is opposed by the local city and county citizens.

Besides having a large majority of the residents against the casino, the Sonoma County Board of Supervisors, local public safety, water, sewage, and traffic personnel are against the casino. Our water resources are already exhausted, our sewage treatment is at it's limit, the site is on an area with vernal pools and the endangered tiger salamander. This does not even take into account the increased traffic and calls for services by our public safety personnel.

The sad thing is that this backroom deal has been done before the tribe has even purchased the property, obtained a land trust and without a compact from the State and yet the council and their supporters are saying it's a done deal. This has created a huge groundwave of opposition to Indian gaming throughout our state and there exists a very real possibility that there will soon be a ballot issue to remove Indian gaming. We already have 53 casinos in 58 counties. Please help us stop this plunder of our city and county by greedy developers and out of state gambling interests.

Steve Bosshard
5769 Dexter Circle
Ronert Park, Ca 94928
(Home) 707 584 5886
(Cell) 707 480 9495

Gale Norton
10/29/2003 05:00 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Rohnert Park Casino

91

Bongchris@aol.com
10/29/2003 04:57 PM

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

Dear The Honorable Gale Norton,
Hi, I am a Rohnert Park, CA citizen and I am writing to tell you that I oppose the casino that is being forced upon us by our city council. I have lived here in this family community for over 20 years and the last thing we need is a casino. There is one only 35 minutes away, for Pete's sake! It would be right down the street from me and ruin the traffic in our nice little town. I understand that we are desperate for funds now, but I wish we didn't have to sell our souls to the casino devils to save ourselves. I don't know if this will even be read or make a difference, but I wanted to say my piece anyways. I am sure you are very busy, but thanks for listening. All I ask is that we get a vote about it in Rohnert Park, instead of it be a "done deal" like they keep saying it is. Thanks, Chris B

Gale Norton
10/16/2003 03:08 PM

To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: Please stop the Rohnert Park, CA casino!

92

"Erica" <eauble@shelterbay.com>
10/16/2003 03:04 PM
Please respond to eauble

To: Gale Norton/SIO/OS/DOI@DOI
cc:
Subject:

The Honorable Gale Norton - Secretary of the Interior,

Hello. My name is Erica. I am 26 years old, married for 4 years and a new home owner in Rohnert Park, California.
I am writing to you today to give my plea against the approval for building a casino Rohnert Park. After signing a petition at my local supermarket a couple weeks ago, I received your email address in yesterday's mail indicating that I could write to you and voice my opinion.

It honestly makes me sick to my stomach to even think about a casino in my home town. Although I am young and the "casino lifestyle" may sound appealing in some ways, all the bad that could come of this certainly out ways the good. I have numerous friends in Rohnert Park (and its surrounding cities) - the thought of having a "monetary temptation" such as the one this enormous casino will provide causes me to feel quite sad. With Sonoma State University right around the corner from my home, I can only imagine all the hard-earned money that these young people will lose due to gambling addictions.

Another major issue that concerns me is the congestion of our main highway (101). I have a horrible commute every morning to work that I wouldn't wish upon anyone. Although it's only 40 miles each way, it can take up to 2 hours just to get to work! You might be wondering why I would put up with such a commute - jobs are scarce during these times and I am quite thankful for what I have. Now that we have a house payment, I need to be responsible and just "suck it up". Consider for a moment trying to make your way home on a Friday evening to a city where you and your husband just purchased your first home - the masses of (more!) people trying to get to this gigantic casino for their weekend entertainment... oh my gosh, 'mam - it just makes me sick!

The population of our tight knit community is only 40,000. We are already squished enough... I don't want this casino to be built here! It just doesn't belong... They need to build somewhere else! Please don't let this happen!

We wanted to raise our children here. If this casino is built, we are probably going to sell our home. It's sad. Really sad.

Thank you for listening to my concerns,
Erica Auble

707-586-9548
948 Elaine Court
Rohnert Park, CA 94928

October 4, 2003

93

RECEIVED
03 NOV -5 AM 11:05
OFFICE OF THE
EXECUTIVE SECRETARIAT

Gail Norton 696311
Secretary of the Interior
1849 C St. Northwest
Washington D.C.

Re: Graton Rancheria Tribe
Indian Casino:
Rohnert Park, Ca. 94928

Dear Madam Secretary;

As a long time resident of Rohnert Park, Ca. we would like to ask you to help us keep a business of this type out of our town. A casino of this size has no right to impose on a family oriented community.

We realize we gave them this right, but dont you agree it is getting out of hand? Especially since they are being backed by Las Vegas operations.

Please help us to keep this sort of business out of our community. We appreciate your kind attention to this matter.

Georgia + Rich Perani
4685 Fairway Drive
Rohnert Park, Ca. 94928
(707) 584-0829

The Honorable Gale A. Norton

RECEIVED
03 NOV -4 AM 10:46
OFFICE OF THE
EXECUTIVE SECRETARIAT

My family has been in Sonoma County since the eighteen hundreds

We are tired of our government giving so much to the Indians because of guilt

Quit! We do not owe them anymore it has to stop.

Do not sell them anymore land for which they are not responsible to the rest of us.

Judith Doyle - Johnson
Regarding Rohnert Park California
Indian Casino
No land.
No Casino

The Johnsons
4591 Heath Cir.
Rohnert Park, CA 94928

Oct 18, 2003

Twyla Fisher
300 Enterprise, #326
Rohnert Park, CA 94928
707•586•2552

696122

RECEIVED
03 NOV -4 AM 10:46
OFFICE OF THE
EXECUTIVE SECRETARIAT

95

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, D.C. 20240

Dear Secretary Norton:

This is to voice my opposition to the Graton Rancheria Tribe Casino Project to Rohnert Park, CA.

I'm concerned that the Casino will have a negative impact on Rohnert Park - by increasing crime, increasing our traffic problem by at least 5,000 more cars daily and adversely impact Rohnert Park's water supply. In addition, the police and fire fighters are against the Casino.

The citizens of Rohnert Park have not been given an opportunity to vote on this issue. It doesn't seem very democratic to have this forced on us when it seems the majority of us are against it. I'm only what one person in favor of the Casino.

I hope you will consider my letter.

Thank you,

Sincerely,

Twyla Fisher

Mr. Peter Callinan
5722 Dexter Cir
Rohnert Park CA 94928

Sat 10/4/03

Dear Secretary Norton,

Please do not approve the application of the Graton Rancheria Indians for a gambling casino in the Rohnert Park area.

Rohnert Park has been a family oriented city since its incorporation in 1962.

We have lived here since 1958.

A gambling casino is completely out of sync with everything Rohnert Park stands for.

Yours Truly

Peter M Callinan

Greta J. Callinan

RECEIVED
03 NOV 24 AM 8:05
OFFICE OF THE
EXECUTIVE SECRETARIA
59603

Veterans of Foreign Wars of
the United States

97

10-26-03

Dear BIA

Anne M. Scholten
P. O. Box 1388
Occidental, CA 95465

Please do not permit more casinos in our area!

The Graton Rancheria evidently plans to build a large casino near Cotati.

While I wish for the original people in this region to be prosperous + well, I do NOT want Sonoma County to look like Las Vegas.

If the tribe is allowed to "take land into trust" for this purpose, it powerfully accelerates the region's change from agricultural use to urbanization. It is WRONG to pave over such rich farmland! Anne M Scholten

NOTE BOOK

-Your Honor Ms. Norton-

My husband and I are against the casino's in our home town of Rohnert Park (Sonoma County) California.

We have lived here 18 years & raised four children & now have 7 grandchildren.

I have attended the city council meetings and have signed petitions. I have carried signs. I have been outspoken about our opposition. (My husband works out of town.)

The council meeting was an eye opener. The members appeared to be staunch about this decision to vote for the approval. Citizens spoke with orderly, reasonable points against this move for our town. Some who wanted the casinos also were given a chance to speak. After the meeting our local papers reported that they had voted to go ahead !!!!!

There are more signatures against this being opposed than ~~there~~ there are citizens in this city because it will effect the lives & image of our surrounding communities in such a negative way in surrounding areas! (60,000+ against)

Please help us to get this on the ballot! We are being railroaded by BIG BUCKS and we don't want a casino in our city!!! Elsie & Harry Glavin Greg & Paula Glavin

1104 Emily Ave.
Rohnert Park, Calif.
94928

(98)

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03 NOV
OFFICE OF THE EXECUTIVE SECRETARY

PROJECT 101
Widening Sonoma County's Corridor

130

September 25, 2003

99

Mayor Armando Flores
Members of the Rohnert Park City Council
City of Rohnert Park
6750 Commerce Blvd
Rohnert Park, CA 94928

Dear Mayor Flores and Members of the City Council:

The Highway 101 Political Action Committee is comprised of local business leaders, including the County's largest employers, who have worked for over two years toward securing federal and state funding for improvements to U.S. 101. Our businesses and employees depend heavily on this transportation artery, and are deeply affected by its present inadequate condition. Needless to say, any further adverse impacts to this "freeway" are of even greater concern.

We take no position whatsoever on whether or not the proposed casino along Stony Point Road in Rohnert Park is a good idea for the City or County. We are astonished, however, that absolutely no environmental impact report has been submitted for this project, nor has any traffic study been performed. Proposed mitigation funds for the casino project omit improvements to Highway 101 altogether (with the exception of a freeway interchange improvement that serves to benefit the casino).

There can be no doubt whatsoever that a casino drawing as many as 10,000-20,000 automobiles a day along with a 300 room hotel and 2000 seat auditorium will have substantial adverse impact on Highway 101. It will also impact Stony Point Road, which many motorists now use as an alternative to US 101 and Hwy 116. It is incomprehensible to us that thousands of Sonoma County residents and visitors will be affected for years to come by worsened conditions on our major transportation routes and yet there is no information available about the nature and extent of this effect, nor are there any plans to mitigate it.

If the plans our group has helped develop are successful, and if we achieve the funding levels we are working toward, we can expect to see improvements on U.S. 101 by the end of this decade. We hope to complete three lanes all the way in ten years.

We believe it is unconscionable to negotiate for benefits to the public from the casino project and totally ignore one of the single biggest factors that can affect the lives of all our citizens for years to come. We hope you will join us by insisting that appropriate information be provided to the public through reputable traffic studies, and that all adverse effects of the casino on our major transportation artery be mitigated.

Sincerely,

Barry Weitzenberg
Chairman

cc: Senator Dianne Feinstein
Senator Barbara Boxer
Representative Wayne Wodsky
Representative Mike Thompson
Secretary of the Interior Gale Norton
Honorable Gray Davis, Governor

EXECUTIVE SECRETARIAT
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03 OCT 2 PM 12:
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2003 FEB 24 PM 3:
291163

SONOMA COUNTY TECHNOLOGY & MANUFACTURING GROUP
637 First Street ▪ Santa Rosa, CA 95404 ▪ 707 545-1414 ▪ FAX 545-6914

130

RECEIVED

03 NOV 13 AM 9:13

OFFICE OF THE
EXECUTIVE SECRETARIAT

100 696686

November 3, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Ms. Norton:

I am writing to you regarding the possibility of a casino being built in Rohnert Park Carlifornia. I am vehemently against the building of a casino and believe that it should receive a strong "No" vote by our representatives. Rohnert Park is a family community that has enough issues with homelessness and crime without adding the stress of small time gamblers roaming the streets. That may sound dramatic but spend a weekend in Reno and you will see that very thing – the filth that the casino's have caused not to mention the lack of water there. Rohnert Park also has water issues and it would be a huge burden to the community to have to supply water to a casino. If the issues of maintaining a family quality of life and lack of water don't compel you to vote against a casino, simply think of the destruction that the building of a casino will do to the environmental beauty of the Rohnert Park area. Why destroy such a pretty area with more traffic and pollution?
I hope that you will do the right think and vote against the building of a casino.

Sincerely,

Linda M. Torres

A very concerned citizen
Linda M. Torres
444 Anson Avenue
Rohnert Park, Ca. 94928

RECEIVED
2003 NOV 14 P 2:36
EXECUTIVE SECRETARIAT

10/24/03

101

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, D.C. 20240

036125

RECEIVED
03 NOV -4 AM 10:46
OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear.Secretary Norton,

I am writing to ask for your **opposition to the encroachment upon our public trust** as it regards the proposed Graton Rancheria Indian Band attempt to build a Casino near **Rohnert Park, California**.

Although I supported the Proposition 1a that grants California Indians an opportunity to move toward self reliance, I have become totally opposed to the manner in which "self-reliance" has become a bludgeon to buy politician support and create land grabs under the auspices of "sovereign nations!"

My understanding is that this particular group already owns land sufficient to create whatever enterprise zone the law will allow; however in deference to some lizard or arachnid type creature's home turf protection, this site has been abandoned to be sold in favor of disenfranchising many hominid species that live and thrive in our community.

Please do not consider us naive' to the " value" of supporting environmental issues at the expense of "moderate voter" unpopularity. A former Governor chose this agenda and has been found wanting.

The idea of establishing "reservations" to create "Casinos" is at best ludicrous and at it's worst fallacious!
To consider their "sovereignty," recognize their historic spirituality and kinship to these creatures and wildlife by designating a harmonious utilization of their already existent property as the most realistically viable to accomplish their ends.

I do not need to reiterate all of the profound arguments against the proposed site near Rohnert Park nor all of the egregious politicizations that have been **"approved" against the will of the majority.**

Please, do the **"right thing, for the people, by the people** and in consideration of their continued **lives, liberty and pursuant happiness**!" As citizens we would like to experience a due deliberation equivalent to the vernal creatures that have replaced us as valued partners in **our democracy**.

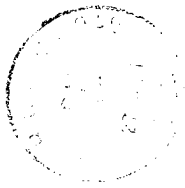
Thank you for your considerate analysis of this issue and feel free to call on me for any assistance.

Yours respectfully,

Irene M. & Virgil C. Matheny

Irene M. and Virgil C. Matheny

10/24/03



THE HONORABLE GALE NORTON
SECRETARY OF THE INTERIOR
1849 C STREET NORTHWEST
WASHINGTON, D.C. 20240

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OV -4 AM 10:46

OFFICE OF THE
UTIVE SECRETARIAT

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ticizations that have been

by the people and in consideration
t happiness!" As citizens we would
ent to the vernal creatures that have
cracy.

this issue and feel free to call on me

Virgil Matheny
1063 Copeland Creek Dr.
Rohnert Park, CA 94928

COURTNEY KELLY
655 Enterprise Dr. #46
Rohnert Park, CA 94928

102

October 23, 2003

RECEIVED
03 NOV -5 AM 9:19
OFFICE OF THE SECRETARY
CULTURAL RESOURCES

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Honorable Gale Norton,

I would like to express my goodwill towards the possible establishment of an Indian gambling casino in my hometown of Rohnert Park, California. Although it has come to my attention that there are a lot of negative aspects that can possibly come the casino, I believe that pros outweigh the cons. Protestors argue that the casino will have legal rights to seize our water supplies, but as a citizen of Rohnert Park, I was assured by the casino that this will not happen. I believe that there will be more jobs, and revenue with the casino in our city. Jobs are necessary in this city, where thousands of college students compete with each other for a minimal amount of jobs per year.

Also, in terms of college students, I think the casino will lead to a decrease in consumption of alcohol by minors in Rohnert Park. Usually students find little else to do on the weekends besides drink, which also is a common cause of car accidents while driving under the influence. With a casino open a short distance away from the campus, students will have something to do that separates us from the high school students, yet is fun for our generation.

I have written this letter to you because it is my understanding that the process of converting private land into a trust that allows a gambling casino to operate is all subject to the goodwill of the surrounding community. The conversion process takes about eighteen months to several years to complete depending on the circumstances. The goodwill or expressions of negative will from local residents are what the Feds in Washington will be looking at. I wanted to express my goodwill because I fear that not enough people have expressed their opinions on this case.

Thank you for your time!

Sincerely,

Courtney Kelly

Courtney Kelly

1103

130

RECEIVED

03 OCT -8 AM 10: 24

OFFICE OF THE
EXECUTIVE SECRETARIAT

Senator Diane Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

694844

Dear Senator Feinstein:

I am writing to thank you for authoring S. 1342, an amendment to the Graton Rancheria Restoration Act. I support this bill because of the undesirable impact a casino will bring to the city of Rohnert Park. We don't need the extra traffic and crowds and we barely have enough water to supply the residents without supplying water to a 3000 room hotel and casino.

I urge you to get the bill passed and signed into law as soon as possible.

Please keep me updated on the progress of the bill.

Sincerely,

Marie Bradley

Marie Bradley
1184 Hailey Court
Rohnert Park, CA 94928

Copies to: Congresswoman Lynn Woolsey
Secretary Gale Norton, Department of the Interior
Mayor Armando Flores, Rohnert Park City Hall

104)

990 Echo Ct.
Rohnert Park, Ca 94928

696413

RECEIVED
03 NOV -7 PM 1:58
OFFICE OF THE
EXECUTIVE SECRETARIAT

130

October 30, 2003

Senator Diane Feinstein
One Post Street Suite 2450
San Francisco Ca 94104

Honorable Senator Feinstein: Re: S. 1342

Thank you for authoring S. 1342, an amendment to the Graton Rancheria restoration Act. Rohnert Park is no place for a casino, in fact I think there should be no more casinos in Northern California. I recently heard that penniless older women have been dropped in the City of Healdsberg. We do not want Las Vegas in California. Nevada did not want any casinos in California until 1-A was passed. The Indians respected the earth and I feel they are being used by Stations Casino.

I voted against 1-A knowing full well possible unfavorable consequences of this bill and here we are. It was not a good bill and needs to be amended or repealed. In the meantime thank you for S.B. 1342.

Sincerely,

Eunice Edgington

Eunice Edgington

CC: Secretary Gale Norton

November 5, 2003

are not even from our area in Sonoma County. Their tribal elder is from Los Angeles. Why do they have to destroy our agricultural/ residential neighborhood?

Please save us from a group of people who are not residents of our town, save us from a Las Vegas based casino company and from the politicians and their nepotism.

Thank you,

Annette Murray, Private Citizen

Cotati, CA

Sonoma County

11/05/2003 13:47 707-522-3106 NORTH COAST PDC PAGE 02

ES 105

Annette Murray, Private Citizen
5780 Lowell Court
Cotati, CA 94931
707. 524.2817
amurray@scoe.org

696386

RECEIVED
03 NOV -6 AM 11:28
OFFICE OF THE
EXECUTIVE SECRETARIAT

Facsimile Transmittal

To:	Gail Norton, Sect. Of Interior	**From:**	Annette Murray, Private Citizen
Fax:	202-208-6956	**Pages:**	3
Phone:		**Date:**	November 5, 2003
Re:		**CC:**	

☐ **Urgent** ☑ **Please Reply**

• Comments:

Please do not approve the casino being planned in my neighborhood by the Graton Rancheria of Sonoma County. We already have drug dealers on the corner nearby and a casino will only bring them more business. It will increase traffic on my county road, it will deplete the water table from which we draw well water.

The whole deal stinks of corrupt politicians i.e. Senator Barbara Boxer's son is legal council for Station Casino incorporated, who bought the land in trust for the Indians. Also insider trading has occurred – 3 businessmen stand to make millions that could have gone to farmers due to their insider knowledge. Please read attached article

Our neighborhood does not support the casino for a group of 14 Indians who

5340 SKYLANE BLVD. SANTA ROSA, CA 95403-8246

The Press Democrat: Print a Story

105

http://www.pressdemocrat.com/local/casino/04casino_a1.html
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3 businessmen to reap millions in RP casino deal

Windfall called a matter of good timing after buying long-sought Rohnert Park dairy land and then selling to tribe

November 4, 2003

by CLARK MASON PRESS DEMOCRAT

A trio of prominent Sonoma County businessmen who had other plans for hay fields west of Rohnert Park now stand to reap a windfall by selling the land to an Indian tribe for a casino.

The Federated Indians of Graton Rancheria is buying the land for its casino from the business partners, who -- just weeks before the tribe announced its plans -- secured the property from two dairy farming families that owned it for generations.

The businessmen, James Ratto, Dennis Hunter and Clem Carinalli, run North Bay Corp., which controls the bulk of the garbage business in the county. They also are involved in major commercial and residential projects in Rohnert Park and other parts of the county.

They or their companies probably will make millions from the sale of the 360 acres to the tribe. But the windfall could be simply a case of good timing, rather than foresight that the land was being eyed by the Indians.

The businessmen or their attorneys said they had been talking for years to the dairy farmers about buying land just outside Rohnert Park city limits. It was just by coincidence, they said, that they bought half the property two months before and secured the other half weeks before the tribe decided to buy it.

The tribe and its partner, Station Casinos Inc. of Las Vegas, have declined to comment on how much they will pay for the 360 acres, although it appears to be less than the $50 million quoted by casino opponents at public meetings.

Tribal Chairman Greg Sarris would only say the price was "exorbitant."

"Immediately, when landowners know that Indians want land, they quadruple the price," Sarris said in an Aug. 19 interview.

"These sellers knew who we were, and we paid through the teeth," Sarris said in August when he announced the tribe had decided to buy the land and build a casino-hotel resort next to Rohnert Park.

11/05/2003 13:47 707-522-3106 NORTH COAST PDC PAGE 03

October 31, 2003 (106)

By MARY FRICKER PRESS DEMOCRAT

Station Casinos Inc., the Las Vegas gaming company that has partnered with Sonoma County's Federated Indians of Graton Rancheria to build and manage a casino in Rohnert Park, said Thursday it is confident the Rohnert Park project will be developed in spite of local opposition.

"We're making progress on the Rohnert Park site.... This site is arguably one of the best in the country," said Station Casinos' chief financial officer, Glenn Christenson.

The comments came during the company's announcement Thursday that its profits more than tripled in the third quarter.

Station Casinos reported earnings of $19.8 million, or 32 cents a share, up from $5.7 million, or 9 cents, last year. Net income in the second quarter was $20.6 million, or 33 cents.

Revenue in the third quarter was $234.7 million, up 12 percent from $209 million.

Officials attributed the threefold increase in earnings in the three months ended Sept. 30 to a 5 percent rise in Nevada casino revenues and to $18.2 million in fees for managing the Thunder Valley Casino in Sacramento, which opened in June.

Station Casinos' common stock closed Thursday at $30.01 a share, down $1.09 on the New York Stock Exchange.

One of Nevada's fastest-growing gaming companies, Station Casinos owns nine Nevada casinos and partial interest in three others. It specializes in casinos that cater to local residents.

"They are definitely, by far, the Las Vegas locals leader," said Joseph Fath, a research analyst with T. Rowe Price Associates.

Station Casinos manages Thunder Valley for the United Auburn Indian Community, for which it anticipates first-year management fees of $65 million to $75 million. Analyst Fath said similar fees are expected from the Rohnert Park casino, which the company expects to begin operating in 2006 or 2007.

"The management agreements are very very profitable pieces of business for the company," Fath said.

The contracts can be lucrative -- 22 percent of revenue for seven years, in the case of the proposed Rohnert Park casino -- because "they're offering a lot of expertise to the tribe, and there's a lot of development risk," Fath said.

The Rohnert Park casino is a key component of the company's future growth, Fath said.

"It's definitely an important piece of the long-term story of the company," Fath said.

Station Casinos has already advanced $12.7 million toward the project, including $3.5 million in the third quarter, mainly to secure real estate, the company said. It expects eventually to advance $35 million to $40 million, of which all but $10 million will be repaid by the tribe.

Company officials said Thursday they are forging relationships with some Sonoma County environmental groups and want to cooperate with local officials and "do the right thing," but local approval is not needed.

130

Marilee Taylor Montgomery (106

152 Wilfred Avenue
Santa Rosa, California 95407

Fax 707-588-9926
Home Phone 707-588-9926
Email donegal@peoplepc.com

FAX

DATE: October 31, 2003

TO: AN OPEN LETTER TO OUR FEDERAL & STATE LEADERSHIP

FROM: Marilee Montgomery

re: Federated Indians of Graton Rancheria

Page One of Three

In an article in today's Press Democrat, Station Casinos speaks out about the Rohnert Park casino proposal, and if there were ever any doubt in anyone's mind what this project is really about, read the article I've included with this fax.

Why is this Las Vegas development company speaking to the issue of what would be an Indian Reservation?

Who are they to state that they are "...confident the Rohnert Park project will be developed in spite of local opposition."?

Who are they to speak for what is a federal process of land acquisition for a Native American tribe?

Listen to what Station Casinos' chief financial officer, Glenn Christenson said : "This site is arguably one of the best in the country...."

Ask yourself: is this a bona fide reservation or a commercial development? Is this an abuse of process?

Who they are is one of the most successful casino developers in Las Vegas, and from the company's statments to the press, it's obvious who this casino is being built for.

WHOSE SHOW IS THIS?????

http://www.pressdemocrat.com/local/casino/31casino.html
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Station Casinos bullish on gaming plans for RP

Third-quarter profits triple, due in part to lucrative gaming management contracts

They said they need to get the U.S. Department of Interior to put the land in trust for the tribe, complete an environmental impact statement, which they've already begun, sign a gaming compact with state officials and get management approval from the National Indian Gaming Commission.

Because of the high profit margins possible from managing tribal casinos, Station Casinos officials said Thursday they are rapidly expanding that part of their business.

The biggest threat to the company's plan to expand its management of Indian gaming in California is Gov.-elect Arnold Schwarzenegger, Fath said. He may be less willing to negotiate agreeable revenue-sharing terms with the tribes or might go into competition with the tribes by, for example, putting slot machines at race tracks.

"They're well positioned in Nevada. That part of the story is safe," Fath said about Station Casinos Inc. "But California and other Native American management contracts that may come up are at risk. There are a lot of hurdles to be cleared."

You can reach Staff Writer Mary Fricker at 521-5241 or mfricker@pressdemocrat.com.

Casino earnings To hear a recording of Station Casinos' third quarter conference call for investors, call (800) 633-8284 before 10:30 a.m. Nov. 4. Enter the registration number 21162937.

Company officials said Thursday they are forging relationships with some Sonoma County environmental groups and want to cooperate with local officials and "do the right thing," but local approval is not needed.

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You can reach Staff Writer Mary Fricker at 521-5241 or mfricker@pressdemocrat.com.

130

Hello,
We are Rohnert Park, CA residents and do not want a gambling casino in our town. Thus far we have not been given any consideration regarding our rights as citizens. We are told the Casino is coming in and we have no say. We are faxing many people in public office asking for help. Some of you are the same people we helped into office. Please hear us and help.
Thank you,
Rebecca Morris
Michael Morris
Sara Levinson
Peder Thygesen

Who's Show Is This?

© The Press Democrat.
Station Casinos bullish on gaming plans for RP (Rohnert Park, CA)
Third-quarter profits triple, due in part to lucrative gaming management contracts
October 31, 2003
By MARY FRICKER PRESS DEMOCRAT
Station Casinos Inc., the Las Vegas gaming company that has partnered with Sonoma County's Federated Indians of Graton Rancheria to build and manage a casino in Rohnert Park, said Thursday it is confident the Rohnert Park project will be developed in spite of local opposition.
"We're making progress on the Rohnert Park site.... This site is arguably one of the best in the country," said Station Casinos' chief financial officer, Glenn Christenson.
The comments came during the company's announcement Thursday that its profits more than tripled in the third quarter.
Station Casinos reported earnings of $19.8 million, or 32 cents a share, up from $5.7 million, or 9 cents, last year. Net income in the second quarter was $20.6 million, or 33 cents.
Revenue in the third quarter was $234.7 million, up 12 percent from $209 million.
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Station Casinos' common stock closed Thursday at $30.01 a share, down $1.09 on the New York Stock Exchange.
One of Nevada's fastest-growing gaming companies, Station Casinos owns nine Nevada casinos and partial interest in three others. It specializes in casinos that cater to local residents.
"They are definitely, by far, the Las Vegas locals leader," said Joseph Fath, a research analyst with T. Rowe Price Associates.
Station Casinos manages Thunder Valley for the United Auburn Indian Community, for which it anticipates first-year management fees of $65 million to $75 million. Analyst Fath said similar fees are expected from the Rohnert Park casino, which the company expects to begin operating in 2006 or 2007.
"The management agreements are very very profitable pieces of business for the company," Fath said.
The contracts can be lucrative -- 22 percent of revenue for seven years, in the case of the proposed Rohnert Park casino -- because "they're offering a lot of expertise to the tribe, and there's a lot of development risk," Fath said.
The Rohnert Park casino is a key component of the company's future growth, Fath said.
"It's definitely an important piece of the long-term story of the company," Fath said.
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106

130

FAX

If you have trouble with this transmission, please call 707-588-9926

DATE: 10/30/2003

TO: The Honorable George W. Bush
The Honorable Richard Cheney
The Honorable Dianne Feinstein
The Honorable Daniel Inoye
The Honorable Ben Nighthorse Campbell
The Honorable Orin Hatch
The Honorable Lynne Woolsey
The Honorable Aurene M. Martin
The Honorable Gale Norton

FROM: Dave Lanatti

re: Federated Indians of Graton Rancheria/Rohnert Park Casino

Page One of

DEAR HONORABLE SENATORS, PLEASE DO NOT ALLOW A CASINO TO BE BUILT IN ROHNERT PARK. I HAVE LIVED IN THIS AREA FOR OVER 40 YEARS, AND HAVE SEEN THIS AREA GROW AND CHANGE DRAMATICALLY IN THE LAST 25 YEARS. WE DO NOT HAVE THE INFRASTRUCTURE TO ACCOMMODATE ANOTHER DRAMATIC BOOST IN OUR POPULATION, OR TO EVEN ACCOMMODATE A SMALL BOOST IN TRAFFIC. I KNOW THAT THE AMERICAN INDIANS ARE A GOOD AND PROUD PEOPLE, AND DESERVE A CHANCE TO BE PROSPEROUS, AND I THINK THERE IS A BETTER PLACE TO BUILD A CASINO. THE AREA BETWEEN FAIRFEILD AND VALLEJO IS MORE APPROPRIATE FOR MANY REASONS, ESPECIALLY FOR TRAFFIC REASONS. IF IT MUST BE IN SONOMA COUNTY, THEN IT SHOULD BE NORTH OF SANTA ROSA, WHERE TRAFFIC IS NOT AS BAD AS IT IS AROUND HERE. THE MAJORITY OF RESIDENTS OF ROHNERT PARK DO NOT WANT A CASINO HERE. THANK YOU FOR YOUR TIME. SINCERELY, MR. DAVE LANATTI. PETALUMA, CA.

130

November 8, 2003

107

To: Gail Norton, Secretary of the Interior, 202 208-6956
Aurene M. Martin, Assistant Secretary – Indian Affairs, 202 208-5320
Andrew Card Jr., Chief of Staff, 202 456-1907
Lewis Libby, Chief of Staff, 202 456-7044

This letter is to express my opposition to the building of a casino in Rohnert Park, California.

Thank you for listening to my opinion.

Sincerely,

Guadalupe Guerrero

Guadalupe Guerrero
235 College View Drive
Rohnet Park, CA 94928
(707) 793-0413

ES 130

108

BETTY ANNE GOULD

704 Brett Avenue • Rohnert Park, CA 94928 • (707) 792-1573 • Cell (707) 481-3608

696400

TRANSMITTED BY FAX: 202-208-6956

November 6, 2003

Gale Norton
Secretary of the Interior
1849 C Street Northwest, MS 7229
Washington, DC 20240

RE: Graton Rancheria Land Trust

RECEIVED
03 NOV 7 AM 8:38
OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear Secretary Norton:

As a resident of Sonoma County California, specifically Rohnert Park, I am asking that you deny the Graton Rancheria request for the land to be placed into trust.

There is *overwhelming* opposition to this casino project by residents of Rohnert Park and neighboring communities.

This particular site is in our County separator, surrounded by homes with wells that will run dry if the resort is built. This site is next door to a 348 site mobile home park. These are tax payers that will have no water and significantly decreased property value if the casino is built.

The concern over water availability in Rohnert Park and the surrounding areas is a documented reality, and it is just one of the major concerns we have regarding this complex being built at this site. This land is habitat for at least 3 endangered species. The infrastructure will not be able to support the increased traffic; and statistics show, and logic tells us, that there will be an increase in crime connected to a project of this type.

In addition to the above negative and *irreversible* impacts of this project, the businesses in our area will suffer. A casino is not patronized by people looking to shop or dine at local businesses – it is patronized by people looking to gamble, drink, and eat on site at the *casino*. The increase in traffic to the casino will, however, congest and frustrate people that ordinarily *would* shop at our stores and eat at our restaurants; thereby, resulting in a loss of revenue to our local businesses.

The negative impacts are real and irreversible. Please help us by not taking the Graton Rancheria land into trust.

Sincerely,

Betty Anne Gould

EXECUTIVE SECRETARIAT
2003 NOV 14 4:36
RECEIVED

130

109

Dear Representative,

I am writing to let you know of my strong opposition to the development of a casino on Federal land in Rohnert Park CA. This type of development is against the values of the community and its neighbors. The environmental and quality of life consequences are not what this community wants.
Please stop the development of a gambling casino in this spot. There are several bills before congress including HR #2656 which would address this issue.

Please contact me if you need further input.
Sincerely,
Patrick S. Coleman
1440 White Oak Drive
Santa Rosa CA 95409

RECEIVED
2003 NOV 14 P 1:36
EXECUTIVE SECRETARIAT

RECEIVED
03 NOV 13 PM 2:26
OFFICE OF THE
EXECUTIVE SECRETARIAT

696778

EXCUSE ME, GAIL,

(110)

Your hurting my community, Please respect Sonoma County

DONT BUILD A CASINO

we Dont want it at our house, build it at yours!

Respectfully yours,

Maryn Cohen
15211 Burbank Dr.
Glen Ellen, CA 95442
(707) 996.8208

RECEIVED
03 OCT 30 PM 2:32
OFFICE OF THE
EXECUTIVE SECRETARIAT

RECEIVED
03 OCT 31 PM 1:11
EXECUTIVE SECRETARIAT

008

None
Rohnert Park, California

confidential fax

696230

To:	**Gail Norton - Secretary of Interior**
Fax Number:	1-202-208-6956

From:	**Jeff Carroll**
Fax Number:	707-588-9709
Business Phone:	
Home Phone:	

Pages:	2
Date/Time:	11/3/2003 5:01:11 PM
Subject:	Indian Gaming in Rohnert Park, California

RECEIVED
03 NOV -5 AM 8:51
OFFICE OF THE
EXECUTIVE SECRETARIAT

Please forward to the appropriate person for review.

Thank you.

November 3, 2003

To Whom It May Concern:

I am writing to express my frustration with indian gaming and to ask for help. Recently, it was revealed to the citizen's of Rohnert Park, California that an indian tribe was moving to secure 360 acres of land on the west side of our city. It soon became obvious that despite the family oriented nature of this small Northern California city, this tribe planned on building a Las Vegas style casino/hotel/resort on this property.

I'm sure you have heard the details of the proposal but have you ever seen our city? If so, you would know that the existing infrastructure cannot support something of this size, even with "mitigation". If so, you would know that it is a family community and not one that wants the neon lights of the big city. If so, you would know that there are ranch, farm, and park land surrounding this city that lends to its beauty and peaceful nature.

I can't believe there is anybody who doesn't see that indian gaming is out of control. I know that these now wealthy tribes contribute a significant amount of money to certain politicians, but take those contributions out of the equation for a moment. Would you folks want this type of thing in your back yard? I'm sure the answer is no. You want to live in a peaceful, safe, quiet environment. If you want to gamble, you go to a gambling community. I love Disneyland but I don't want to live next door to it.

Even the people who voted in 2000 to allow indian gaming to help the tribes establish "self-reliance" didn't imagine this. Those people envisioned small gaming rooms on existing indian land, not native americans buying every empty parcel they can find to build "Caesar's Palace". I too believe in self-reliance. As a matter of fact, I am self-reliant. I have a job. In fact, the job that I have gives preferential points in the application process to people of minority, including native americans. Indian gaming has nothing to do with "self-reliance" and everything to do with a few people getting rich. This has nothing to do with the wrongs the native americans suffered centuries ago and everything to do with modern day opportunity.

We realize we have no local control over this "sovereign nation" but you do. Please help to protect the citizens of this state and establish reasonable regulations for these tribes that prevent these huge casinos from spreading like wildfire throughout California's neighborhoods.

There is a place for casinos but in small cities and communities, adjacent to our schools, homes, playgrounds, and parks is not one of them.

Sincerely,

Jeff Carroll

Jeff Carroll
Rohnert Park, CA.

(112)

October 11, 2003

RECEIVED

OCT 14 2003

CALIFORNIA INDIAN
LEGAL SERVICES

California Indian Legal Services
510-16th Street, Fourth Floor
Oakland, CA. 94612

Dear Sirs:

We are writing in regards to the Graton Rancheria Indians proposed Casino to be built on the out skirts of Rohnert Park. Ca. We live on the hill west of the proposed site. Our concern is the fact that we have little water now and if your start draining the water from deep wells, we will go dry in a short period of time. Feel if you plan to put in such deep water wells we should be promised that you will furnish water to the people that have been affected from you doing such a thing. It will leave our land with no value at all if we do not have water. Also we would not be able to live here either if the water is gone.

We would also like to know how you are going to handle all the traffic on roads such as ours. It bothers us that you do not seem to care once you get in an area and the land in your name you do as you please. I do not understand how they managed to talk you out of the land at Sears Point. It is out away from people and you would have traffic from all areas going near the Casino and think it would be a much better area than what you have here.

We voted in favor of the Casino's, but thought you would build on the land that you have and not be able to go and take over any land that you desire and thumb your nose at every one else. I am so sorry that you do not respect us as we did in helping you do this to us.

Sincerely,

Fred & Marla Bush

5265 Gilchrist Rd.
Sebastopol, Ca. 95472

CALIFORNIA INDIAN LEGAL SERVICES

Oakland Office

510 16th Street, Fourth Floor, Oakland, CA 94612 ✦ Phone: 510/835-0284 ✦ Fax: 510/835-8045
www.calindian.org ✦ calindian@calindian.org

BISHOP
EUREKA
ESCONDIDO

John A. Maier, Senior Staff Attorney
(510) 835-0284, Ext. 303
johnm@calindian.org

OAKLAND
SANTA ROSA
WASHINGTON, D.C.

113

December 4, 2003

Fred & Maria Bush
5265 Gilchrist Road
Sebastopol, CA 95472

Dear Fred and Maria Bush:

I am writing in response to your letter dated October 11, 2003, which discusses your concern that the resort casino being proposed by the Federated Indians of Graton Rancheria near Rohnert Park will dry up your well. I am forwarding your letter to the consultants who have been hired by the National Indian Gaming Agency to analyze the impacts of the proposed casino by preparing an environmental impact statement under the National Environmental Policy Act (NEPA). The environmental review process is expected to take several years and will provide ample opportunity for public comment. The concerns expressed in your letter will be treated as a public comment with respect to the initial scoping process.

While I understand your frustration with the move from Sears Point to Rohnert Park, I think it is unfair of you to claim that the Tribe has thumbed its nose at every one else. From the beginning, the Tribe has taken extraordinary steps to work with the County and local communities to address their concerns as they exercise their right to replace the reservation that was illegally taken from them forty years ago. The Tribe has every intention to continue to work with the community so that the project benefits not only the Tribe's members, but also the people of Sonoma County.

Sincerely,
CALIFORNIA INDIAN LEGAL SERVICES

John A. Maier
Senior Staff Atttorney

JM:ls

Dear Honorable Gale Norton.

I say no to the Casino for Rohnert Park.

I moved here many years ago from New York and I was so happy to find this little town. My family loves it and all my friends of which I have many.

As it is the traffic is terrible at this time it starts at 4 AM right next to our windows of our houses.

Having the Casino would not be any good.

I do hope you can help people like myself.

Rohnert Park was unique and everyone was very happy.

As it is the traffic is heavy and

RECEIVED
03 OCT 22 PM 2:
OFFICE OF THE
EXECUTIVE SECRETARIAT
9508

see reverse side

NO
on the casino in
Rohnert Park Calif.

Mr & Mrs G.D. Ryan

PROPERTY MANAGEMENT
P.O. BOX 2605
ROHNERT PARK, CA 94928

NORTH BAY CA 949
PM
23 OCT
2003

The Honorable Gale Norton
Secretary of the Interior
1849 C st. N.W.
Washington D.C.
20240

NOTES

10-18-03

To The Honorable
Gail Norton

I strongly oppose the building of a casino in the large family-oriented little City of Rohnert Park California.

Please help us!

Thank you

Respectfully,
Velda Hoover

2003
Velda Hoover
108 Calle Roja
Rohnert Park, CA 94928

RECEIVED
OFFICE OF THE
EXECUTIVE SECRETARIAT
2003 OCT 29 AM 8:45

9/09/03

Vice President Dick Cheney,

As a Republican who is proud of you & your service to our President & our country, I plead with you to oppose an Indian gambling casino being built in Rohnert Park, CA.

Thank you!

Carol J. O'Donnell

576 Racquet Club Circle
Rohnert Park, CA
94928

117

695952

ALBERT E. DAWSON,
342, ALISON AVE,
ROHNERT PARK
CA. 94928.

RECEIVED
03 OCT 29 AM 8:46
EXECUTIVE SECRETARIAT

10-22-03

TO THE HONORABLE GOVERNOR,

THE ROHNERT PARK CITY OFFICIALS, IN A CLOSED DOOR SESSION, APPROVED A CASINO IN ROHNERT PARK.

THE FIFTH COUNCILMAN EXPOSED THIS CLOSED SESSION, AND IN MY OPINION & I MIGHT ADD THE MAJORITY OPINION IN ROHNERT PARK IS THAT THE CASINO IS NOT WELCOME HERE.

4 OF OUR CITY COUNCIL HAVE TAKEN IT UPON THEMSELVES TO IGNORE THE CITIZENS THEY ARE SUPPOSED TO SERVE & HAVE DONE A DEAL WITH THE DEVIL (GAMBLING)

UNFORTUNATELY ROHNERT PARK HAS BEEN SUBJECT TO THIS ON MANY OCCASIONS, AS OUR CITY COUNCIL IS ELECTED BY A MINORITY OF THE PEOPLE BECAUSE MOST ARE FED UP OF VOTING. (TO QUOTE A CLOSE FRIEND) "I DONT VOTE ANY MORE BECAUSE THEY DONT GIVE ME ANYTHING I WANT." THIS IS UNFORTUNATELY A LOT OF PEOPLE.

WE ARE HOPING FOR ANY TRYING TO ELIMINATE THIS COUNCIL & CURRENTLY SEEKING A RECALL ON ALL FOUR COUNCIL MEMBERS AND IF WE CAN GET IT TO A VOTE, THEY WILL BE GONE.

SONOMA COUNTY SUPERVISOR'S APPOSE & SO DO WE.

YOURS TRULY

ALBERT E. DAWSON

(taxpaying) owner, or restauranteur in Rohnert Park, I would fear for my future. Why would visitors pay $75.00 and up for a room at my motel if they can get one at the Casino for $50.00, or pay $20.00 and up for a steak dinner at my cafe when they can get one at the Casino for $7.95? Due to its gambling revenue the Casino can afford, at will, to undersell any local merchant.

My hope is (and here I join the majority opposition) that you, Honorable Secretary, will use your good offices to oppose the Casino Project in our city. Thank you much.

Cordially,

Wallace Drotts

Dr. Wallace Drotts

4515 Foust Court
Rohnert Park, CA. 94928
October 22, 2003

695965

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03 OCT 29 PM 12:17
OFFICE OF THE
EXECUTIVE SECRETARIAT

118

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Honorable Gale Norton:

I am a Republican, but write now with reference to a local issue. Thank you, by the way, for the services you render our nation, a burdensome task at times, I'm sure.

You may have been made aware by now of a controversy in our city, Rohnert Park, CA., a town of 45,000 people. Negotiations are presently at work between our City Council and the Federated Indian Nation of Graton Rancheria to place a Casino on the outskirts of the city. Perhaps you are aware that the previous request of this "Nation" to place a Casino near the Sears Point Race Track was denied through the influence of Senator Feinstein. I write as a local citizen in opposition to the Casino.

Two public hearings have been held recently at our spacious Spreckles Theatre, attended by over five hundred residents at each hearing (standing room only), at which opposition ran nine to one. Despite that overwhelming opposition, after each hearing, the City Council voted to proceed with negotiations. Understandably the citizens are outraged.

Not unlike other cities, our Council feels the pressure of budgetary deficits, and cannot resist the lure of the Casino's big money promises to relieve their economic ulcers. Every city resident here "feels their pain," but regrets that its members close their ears to the will of the majority as the way out of their financial woes. In a letter to each member of the Council I quoted Mark Twain's pejorative line: "We have the best politicans that money can buy."

Aside from the legal fiction of Indian "Nations" within our one Federal Nation (USA), and the unique tax-free privileges extended them, a Casino of this magnitude on the outskirts of Rohnert Park would change its future character forever. So we turn to you for help in our effort to halt the Casino Project. Thank you for your consideration.

My wife and I moved to this city ten years ago in part because of its family orientation, a healthy place to raise children. Many already have addressed the potential traffic problems, crime, etc. with the influx of gamblers. But, were I a hotel

4579 Harmony Place
Rohnert Park, CA 94928
Fax: 707-584-3419

Matthew T. Smith

Fax

To:	The Honorable Gale Norton	**From:**	Matthew T. Smith
Fax:	202-208-6956	**Pages:**	2
Phone:	202-208-7351	**Date:**	10/24/03
Re:	Proposed Las Vegas style Casino near Rohnert Park, CA 94928	**CC:**	[Click **here** and type name]

☑ **Urgent** ☑ **For Review** ☐ **Please Comment** ☑ **Please Reply** ☐ **Please Recycle**

• **Comments:** Your Honor, please review the attached document regarding our steadfast opposition to the proposed casino on the boarder of Rohnert Park, CA 94928. http://www.stopthecasino101.com

695727

RECEIVED
03 OCT 27 AM 8:05
OFFICE OF THE
EXECUTIVE SECRETARIAT

MATTHEW T. SMITH

October 24, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

119

RECEIVED
2003 OCT 29 P 1:13
EXECUTIVE SECRETARIAT

Dear Honorable Gale Norton:

SUBJECT: OPPOSITION TO THE PROPOSED LAS VEGAS STYLE CASINO IN SONOMA COUNTY, CA

I am writing this because something must be done to stop the to the *proposal* for a casino near the Southwest boarder of Rohnert Park, CA. The citizens of Rohnert Park and the surrounding communities are vehemently opposed to any such casino near our family-oriented cities.

We continue writing our Government officials to gain support for our cause. Because we know that the final decision on this matter rests with the Federal Government in Washington DC. Simply put – our cause is just one – our cause is to save our cherished community from the certain degradation of property values; family values; water supplies; and our socioeconomic health. We are trying desperately to save our community.

Additionally, I would like to point you to the National Gambling Impact Study Commission Report. http://govinfo.library.unt.edu/ngisc/reports/fullrpt.html. Here is an excerpt from the report:

"Some of the more thorough studies examine crime and pathological gambling. Not surprisingly, the findings reveal that many problem and pathological gamblers steal or commit other crimes to finance their habit. According to the National Research Council, "As access to money becomes more limited, gamblers often resort to crime in order to pay debts, appease bookies, maintain appearances, and garner more money to gamble." In Maryland, a report by the Attorney General's Office stated: "casinos would bring a substantial increase in crime to our State. There would be more violent crime, more juvenile crime, more drug- and alcohol-related crime, more domestic violence and child abuse, and more organized crime. Casinos would bring us exactly what we do not need a lot more of all kinds of crime." Some commentators link crime to pathological gambling, where addicted gamblers steal or commit other crimes to finance their habit. The Commission heard repeated testimony of desperate gamblers committing illegal acts to finance their problem and pathological gambling, including a Detroit man who faked his own son's kidnapping to pay back a $50,000 gambling debt, a 14-year hospital employee in Iowa who embezzled $151,000 from her employer for gambling, and the wife of a Louisiana police officer who faced 24 counts of felony theft for stealing to fund her pathological gambling. In a survey of nearly 400 Gamblers Anonymous members, 57 percent admitted stealing to finance their gambling. Collectively they stole $30 million, for an average of $135,000 per individual. One witness before the Commission indicated that "80 to 90 percent of people in Gamblers Anonymous will tell you they did something illegal in order to get money to gamble." A lot of them do white collar crimes, fraud, credit card and employee theft." In Louisiana, one man confessed to robbing and murdering six elderly individuals to feed his problem with gambling on electronic gambling devices."

The following is my personal plea to you – because you have the power to ensure our community remains a family-friendly one, and that my daughter can grow up in a safe and free community!

Rohnert Park residents should never have to worry about how we are going to **mitigate** the impact of having a casino on the boarder of our wonderful little city. There is **NO** amount of compensation that would negate the increase in crime; traffic; alcohol & gambling addictions; DUI-related accidents & deaths; and skyrocketing infrastructure costs that invariably follow casino development.

In conclusion, based on the compelling data provided herein I submit that you should deny the request by the Federated Indians of Graton Rancheria to take this land into trust.

Sincerely,
Matthew T. Smith
Matthew T. Smith

4579 HARMONY PLACE • ROHNERT PARK/CA • 94928
PHONE: 707-584-8415 • FAX: 707-584-3419
HTTP://WWW.STOPTHECASINO101.COM

I am writing you on the subject of the pending casino site in Rohnert Park. I am 35 years old and finally have reached the American dream of owning my own home. This has been a dream come true. One of the reasons for our decision to move to Rohnert Park was the family oriented community. Now that I have finally bought a home the next step would be to raise children. The other reason is the rural countryside the city is nestled in. Sonoma County has always been known for its cows, farms, as well as vineyards. To make a long story short my husband and I were extremely disappointed with the thought of placing a casino very close to our new home. The councils reasoning are that the city needs the money. I grew up in Marin County that has become too expensive to purchase a home. That is another reason we have moved to Rohnert Park, the money is on its way. Many people from Marin are moving north. Putting a Casino here is just going to chase people away, especially people who want to start a family. Its not just people that live in Sonoma County who feel this way, all friends, family, colleagues etc. feel very strongly the casinos are a horrible idea and don't understand why its happening. People are outraged and feel they are not being heard. Please hear us and help stop this totally inappropriate location for an Indian casino. Thankyou very much for taking the time to read this letter.

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03 OCT 23 AM 10:36
OFFICE OF THE
EXECUTIVE SECRETARIAT
685651

Suzanne Murphy

4551 HARMONY PLACE
ROHNERT PARK 94928

130

Oct 16, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

RECEIVED
03 OCT 24 PM 2:00
OFFICE OF THE
EXECUTIVE SECRETARIAT

69517

120

I am writing to express my concern regarding the proposed casino in Rohnert Park, California. There are so many reasons why I oppose it and I will not list them all. I believe the majority of Rohnert Park citizens are opposed because of the affect this 550 acre casino will have on Roads, Crime, and water supply. When the city counsel seems to value future promises of money over voice of their people, there is reason for great concern. Thank you for your consideration.

Sincerely,

Marlene S. Waltz

Marlene S Waltz
4691 Fairway Drive
Rohnert Park, Calif.
94928

(124)

10/17/03

The Honorable Gale Norton
695650

RECEIVED
03 OCT 23 AM 10:36
OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear Mrs Norton

I am writing this to express my opposition to build a Casino just outside the city limits of Rohnert Park, Ca. a city of 40,000. There are three casinos within 50 miles of Rohnert Park, the Casino planned for Rohnert Park by the Graton Rancheria tribe is over kill for this area. The Casino will only bring major problems to this community.

Please deny their request for Federal approval which I understand is required.

Respectfully
Don Backens

D.A. BACKENS
4349 FAIRWAY DR
ROHNERT PARK, CA 94928

121

10-18-03

Secretary of Interior

I oppose the casinos

Thanck you

Lorraine Affonso
117 Walnut Circle
Rohnert Park Ca.
94928

The Honorable Gale Norton,

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03 OCT 23 AM 10:36
OFFICE OF THE EXECUTIVE SECRETARIAT
695648

I am ~~writing~~ to you to oppose the building gambling casino in Rohnert Park, California. I am a resident of a College town and a family oriented city. But no place for a casino. I have signed petitions opposing the casino and I hope that you will help us to find a way to move the casino to another location.

Ann Stout
196 Circulo Galicia
Rohnert Park 94928
Oct 19, 2003

A Casino next to Rohnert Park
IS NOT a "done deal"!

1. The truth **is**–

The Graton Rancheria Tribe has **not** bought any property, **no** land trust has been approved by the Federal Government, and **no** compact has been made with the State of California.

So why are some Rohnert Park city officials saying it's a "done deal" and negotiating when nothing has happened?

2. The truth **is**:

The casino at Sears Point was stopped because of public protest, environmental impacts and the influence of politicians at all levels of government.

It can be stopped, so why are some Rohnert Park city officials negotiating instead of opposing the casino?

3. Water **is** a serious issue for Rohnert Park.

Rohnert Park is under legal obligations to ensure control of water used by the city. A 350-acre casino resort is not a part of the city or county water plan and will adversely impact Rohnert Park's water supplies and obligations. The casino will have legal rights to seize our water supplies.

4. Rohnert Park police and fire fighters have spoken out against the casino.

5. Rohnert Park city council members have developed a Memorandum of Understanding (MOU) in consultation with the tribe. It states that "accordingly the city will agree **NOT** to oppose the tribe's efforts" in exchange for future promises of money. This MOU was completed without any formal input or voting by citizens. Our city and its citizens ARE NOT FOR SALE!

WHAT YOU CAN DO TO STOP THE CASINO!

-Sign petitions against the casino!

-Attend the city hall meetings on Tuesday nights (10/14, 10/28, 11/11, 11/18) and voice your opposition to the casino!

-Write the Secretary of the Interior and say you oppose the casino!

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest

RECEIVED
03 OCT 23 AM 10:36
OFFICE OF THE
EXECUTIVE SECRETARIAT

Oct. 15, 2003
Weds.

695647

123

From:
Penny Moon Rocha
904 Joanne Ct. #D
Rohnert Park, CA. 94928

Dear The Honorable Gale Norton -

I am writing to say that I OPPOSE THE CASINO! for Rohnert Park, CA.
I want to help STOP the Casino from coming into Rohnert Park or even in Sonoma County.
I am also including my parents names and my daughter -
*Forrest L. Moon
*Masako Moon - yes - she is a U.S. citizen she took the test and is originally from Japan.
She also NEVER collected welfare like most illegal citizens do from the taxpayers of this state and country.

My daughter is -
*Misty Moon O'Connell
*Dave O'Connell - my son-in-law

You can use my address for them also, it would be much easier if you need them. So, here you have 5 more people who are against more growth and especially against an Indian Casino coming into our city.
I don't see how it would be a benefit for the citizens, it would just be more people, traffic, etc. It is already too congested as it is and the cost of living here is too expensive and the wages from our jobs don't pay what it takes to live here in a decent way.

Thank-You and please add our names to the list of people who are against the Casino coming to Rohnert Park, CA.
Sincerely -
Penny Moon Rocha

WHAT YOU CAN DO TO STOP THE CASINO!

-Sign petitions against the casino!

-Attend the city hall meetings on Tuesday nights (10/14, 10/28, 11/11, 11/18) and voice your opposition to the casino!

-Write the Secretary of the Interior and say you oppose the casino!

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Or call her office: (202) 208-7351 Or email; gale_norton@ios.doi.gov

-Get more info on line at www.stopthecasino101.com

-Join the march in Rohnert Park on November 8, 10 A.M., Labath Ave and RP Expressway, to show your opposition to the casino!

It is YOUR city and you have the RIGHT to be heard!

Misty Moon & Dave O'Connell

October 23, 2003

125

Gail Norton
Secretary of the Interior
1849 C Street Northwest
MS 7229
Washington DC, 20240

Dear Ms. Norton,

I am writing to ask you to **support our opposition** for a casino to be built in Rohnert Park, California. The proponents of this casino are the Graton RancheriaTribe along with Station Casinos, Inc,. who are a huge corporation in Las Vegas.

We are a family-oriented town who would like to see it stay this way

Water is a serious probelm for Rohnert Park. A 350-acre casino resort is not a part of the city or county water plan and will have huge impacts on our water supply The casino will have legal right to seize our water supply.

Rohnert Park police and fire fighters have spoken out against the casino.

Sonoma County Board of Supervisors voted against the proposed casino.

Rohnert Park residents do not want to see crime and drugs come into our community

Please say no to this proposed casino. We cannot support it and the majority of residents will not accept it.

Thank you,

Janice Hyde
jhyde@sonic.net
5744 Davis Cir
Rohnert Park, CA 94928
(707) 588-1221

126

592248

RECEIVED
03 AUG 28 AM 7:57
OFFICE OF THE
EXECUTIVE SECRETARIAT

August 22, 2003

44800 Woodstock Dr.
Mendocino, CA 95460

Honorable Gail Norton
Secretary of the Interior
Department of the Interior
Washington D.C. 20240

RE: Graton Rancheria Casino Proposal

Dear Gail Norton,

The Federated Indians of Graton Rancheria is planning to build a major Las Vegas type casino complex on 2,000 privately owned acres in southern Sonoma County. This land is environmentally sensitive property.

The language in past bills circumvents established federal regulations. Graton's trust application should be handled no differently than any other requesting private land become sovereign status.

Please support S1342 and HR2656 to amend the Restoration Act by changing "shall" to "may" so the required regulatory review process can be applied.

Thank you for your consideration in this matter.

Sincerely,

M. Cheyovich

Michele Cheyovich

130

EXCUSE ME, AURENE,

Your hurting my community, Please respect Sonoma County

DONT BUILD A CASINO

We Dont want it at our house, build it at yours!

Respectfully yours,

127

Maryn Cohen
15211 Burbank Dr.
Glen Ellen, CA 95442
(707) 996.8208

Dear Secretary Norton, 10/21/03

I am writing to you to discuss a situation, which is critical to the well being of our neighborhood. I live in Cotati, CA (about 40 miles north of San Francisco). Because of the passage of Prop. 1A, the Graton Rancheria tribe of Indians wants to put a gambling casino just oustside the city limits of Rohnert Park, and just about ½ mile west of Highway 101. The casino would be the first of its kind stuck right in the middle of an existing community – with Santa Rosa flanking its north side, Rohnert Park and Cotati on its eastern and southern side and unincorporated Sebastopol on its western side. Because the mayor of Rohnert park and the city council seem to think that it is "inevitable" and a "done deal", they have chosen to negotiate with the tribe to help mitigate some of the effects. The tribe spokesman, Greg Sarris, clearly stated that they would claim that land for a casino PERIOD! The problems for this project are enormous.

- The community DOES NOT WANT ORGANIZED GAMBLING THRUST IN THE MIDDLE OF THEIR COMMUNITY! People (myself included) didn't understand that Prop. 1A allowed tribes to buy any parcel of land they wish and then call it their sovereign nation. There is a grassroots move underway to recall every member of the Rohnert Park City Council and all the Sonoma County supervisors because the people in my community feel so strongly about organized gambling and the problems that go along with it (more crime, drugs, traffic etc.)

- The General plan in Sonoma County, Santa Rosa, and Rohnert Park have called for this parcel of land to be kept as community separator between the cities because of the wetland concerns, endangered species, the beauty and the sensitive environmental nature of this land. Much community effort and input went into these General Plans. How can Station Casinos in Las Vegas (the financial backer of this project) and a newly formed Indian tribe circumvent this and put a gambling establishment there that our families don't want?

- The gambling casino projects making 500 million dollars per year – money that will be sucked from our community and left on card tables and in slot machines in this facility. Given today's economic climate, you must be aware that our communities are suffering enough without this type of drain.

- If you've driven on the freeway between Petaluma and Santa Rosa, you know how horrible the traffic presently is. A 500 million-dollar per year gambling casino in the **middle** of these cities will bring traffic to an absolute standstill.

- The 48 members of the Graton Rancheria tribe are no more needy than the majority of the rest of the people in California. They go to the same schools and have the same jobs as the rest of us. Yet because they claim to have some Indian ancestry, they are set to be the next group of multimillionaires. I thought our constitution said that all people are created equal. If we say that one race can operate an organized gambling parlor and another race can't, aren't we practicing racism? Unfortunately the Nevada gaming industry is exploiting this loophole, which is why they have a financial interest and investment in all of California's almost 60 casinos.

We desperately need legislation to stop Las Vegas from putting organized gambling and all the crime and substance abuse problems associated with gambling addictions into the very **hearts** of our local communities. I implore you to do something to stop this trend and to help us stop the "inevitable" gambling casino in Rohnert Park.

OFFICE OF THE EXECUTIVE SECRETARIAT
03 OCT 29 AM 8:45
RECEIVED
695948
128

Sincerely,

John Metras

John Metras
7659 Isabel Drive
Cotati, CA 94931 (707) 664-8541 jmetras1@excite.com

10-21,-2003

(129)

RECEIVED

03 OCT 29 AM 8:45

OFFICE OF THE
EXECUTIVE SECRETARIAT

DEAR 695849 ~~SUE~~ NORMA

MAY I INTRODUCE MY SELF I AM Dale, Rickey THE CHIEF OPERATIONS OFFICER OF SONOMA AIRLINES, THE REASON I AM WRITING YOU IS TO PROTEST AGAINST THE CASINO IN ROHNERT PARK BY THE INDIAN GROUP. I HAVE NOTHING AGAINST INDIANS MAKING MONEY BUT A QUESTIONABLE CASINO IN ROHNERT PARK. ALSO I KNEW JOHN WHITE HE WAS A FIRE INSPECTOR FOR THE COUNTY OF SONOMA, CITY OF PETALUMA FIRE DEPARTMENT, HE TOLD ME THE CASINO WAS A 'FIRE TRAP' AND NOT TO WORK THEIR, HE ALSO SAW THE PLANS FOR THE CASINO IN BOTH PLACES AND THEY ARE NEAR A SCHOOL (K-12) AND IS A FIRETRAP.

SINCERELY

Dale Rickey

RICKEY

101 Enterprise Dr #123
Rohnert Park 94928

10/21/03 130

Dear Secretary Norton,

I am writing to you to discuss a situation, which is critical to the well being of our neighborhood. I live in Cotati, CA (about 40 miles north of San Francisco). Because of the passage of Prop. 1A, the Graton Rancheria tribe of Indians wants to put a gambling casino just oustside the city limits of Rohnert Park, and just about ½ mile west of Highway 101. The casino would be the first of its kind stuck right in the middle of an existing community – with Santa Rosa flanking its north side, Rohnert Park and Cotati on its eastern and southern side and unincorporated Sebastopol on its western side. Because the mayor of Rohnert park and the city council seem to think that it is "inevitable" and a "done deal", they have chosen to negotiate with the tribe to help mitigate some of the effects. The tribe spokesman, Greg Sarris, clearly stated that they would claim that land for a casino PERIOD! The problems for this project are enormous.

- The community DOES NOT WANT ORGANIZED GAMBLING THRUST IN THE MIDDLE OF THEIR COMMUNITY! People (myself included) didn't understand that Prop. 1A allowed tribes to buy any parcel of land they wish and then call it their sovereign nation. There is a grassroots move underway to recall every member of the Rohnert Park City Council and all the Sonoma County supervisors because the people in my community feel so strongly about organized gambling and the problems that go along with it (more crime, drugs, traffic etc.)

- The General plan in Sonoma County, Santa Rosa, and Rohnert Park have called for this parcel of land to be kept as community separator between the cities because of the wetland concerns, endangered species, the beauty and the sensitive environmental nature of this land. Much community effort and input went into these General Plans. How can Station Casinos in Las Vegas (the financial backer of this project) and a newly formed Indian tribe circumvent this and put a gambling establishment there that our families don't want?

- The gambling casino projects making 500 million dollars per year – money that will be sucked from our community and left on card tables and in slot machines in this facility. Given today's economic climate, you must be aware that our communities are suffering enough without this type of drain.

- If you've driven on the freeway between Petaluma and Santa Rosa, you know how horrible the traffic presently is. A 500 million-dollar per year gambling casino in the **middle** of these cities will bring traffic to an absolute standstill.

- The 48 members of the Graton Rancheria tribe are no more needy than the majority of the rest of the people in California. They go to the same schools and have the same jobs as the rest of us Yet because they claim to have some Indian ancestry, they are set to be the next group of multimillionaires. I thought our constitution said that all people are created equal. If we say that one race can operate an organized gambling parlor and another race can't, aren't we practicing racism? Unfortunately the Nevada gaming industry is exploiting this loophole, which is why they have a financial interest and investment in all of California's almost 60 casinos.

We desperately need legislation to stop Las Vegas from putting organized gambling and all the crime and substance abuse problems associated with gambling addictions into the very **hearts** of our local communities. I implore you to do something to stop this trend and to help us stop the "inevitable" gambling casino in Rohnert Park.

Sincerely,

OFFICE OF THE EXECUTIVE SECRETARIAT
03 OCT 24 PM 12:35
RECEIVED
695708

John Metras
7659 Isabel Drive
Cotati, CA 94931 (707) 664-8541 jmetras1@excite.com

131

RECEIVED

03 OCT 29 AM 8:46

OFFICE OF THE
EXECUTIVE SECRETARIAT

Sunday, October 19, 2003

695953

RE: **AGAINST THE PROPOSED CASINO IN ROHNERT PARK, CA**

To the Secretary Gail Norton:

Against the expressed will of the overwhelming majority of its citizens, Rohnert Park Mayor and City Council have negotiated with the partnership of Stations Casino, Inc. and the Federated Indians of Groton Rancheria to establish a gaming facility in Rohnert Park (RP).

The memorandum of understanding (MOU) between the City Council and the partnership is legally non-binding. Promised, but not guaranteed, money is supposed to mitigate the negative impacts to our community of a 360-acre casino development next to our city.

However, it is clear from research into how casinos have affected other communities in California that the tribes will not pay anything close, if anything at all, to the true cost of all the negative impacts on the community.

- **Casinos can legally steal the water supply from the community, driving up water costs for the citizenry and driving down the real estate values in the area.**
- **The increase in crime and traffic cause an escalation of cost of police and auto insurance to be borne by the community.**
- **Casinos have driven down property values of the residents, who cannot sell their homes for what they paid for them. Prospective buyers do not want to raise their family next to a casino, where drugs are sold and pandering of sex occurs 24/7. Ramona, CA is a prime example of how real estate prices tumbled.**
- **Since the Casino is not obliged to pay for its water and sewage, these costs must be borne by the citizenry.**
- **Studies show that 1½ jobs are lost for every gaming industry job that is created.**

Why are the city officials pandering to the Las Vegas Casinos? For Money? Please do all you can to stop the Gambling Industry takeover in Rohnert Park, California.

Sincerely,

Johanna Cancro

Johanna Cancro
7343 Castille Ct
Rohnert Park, CA 94928

132

10-23-03

Dear Secretary Norton,

This letter tries to explain why our neighbors and we appose the Rohnert Park Casino so desperately:

First we feel that the casino will bring crime and an element into our residential community that can only affect the life style and safety of every one of these children. We feel that our children, in particular, will feel the first effect of this negative condition. We feel strongly that the involved regulatory agencies should exercise their influence to insure that this loophole in statutory law does not affect our entire community and become a template for other communities in other cities to follow suit.

The Casino advocates would like all to think that the casino project has become a "Done Deal." I believe that this may become that only if we do not point out the many disadvantages to the communities that would follow, and if you as a governing body do not assert you influence.

As a California resident I feel that this issue in Rohnert Park will become the cornerstone whereby the Casino interests build their empire in so many other communities in both California and in the rest of the country.

Sincerely,

Sandra Weiner
5137 Elrose Avenue
San Jose, Ca. 95124
408 235 1376

RECEIVED
03 OCT 24 PM 12:35
OFFICE OF THE
EXECUTIVE SECRETARIAT

695709

** TOTAL PAGE.01 **

Dear Honorable Rose Morton.

I say no to the Casino for Rohnert Park.

I moved here many years ago from New York and I was so happy to find this little town. My family loves it and all my friends of which I have many.

As it is, the traffic is terrible at this time. It starts at 4 AM right next to our windows of our house.

I think the Casino would not be any good.

I do hope you can help people like myself.

Rohnert Park was unique and everyone was very happy.

As it is, the traffic is heavy and

EXECUTIVE DEPARTMENT 03 0 9 5 0 0 8 0 0 9 5 0 0 8 0 0 9 5 0 0 8 0

having the casino round be awfull.
Here is a list of my friends who have been
here longer than I and they feel like Myself
Thank You for helping we appreciate it

(1) Fern R. Robertson 1188 Hailey Ct
PS. We Love our Little town - Rohnert Park Ca
94928

(2) Marie Bradley. 1128 Hailey Ct
Fernande R Robertson 1188 Hailey Ct
Rohnert Park Ca
94928

PS most of the people I have talked to
beside my friend & my neighbors They
feel the same way as we do

We are appreciate your helping us.

Thank you
F R Robertson

(134)

Wayland Lee
7347 Cornell Ave. Rohnert Park, CA
94928
(707) 664-8516
compilot@earthlink.net

RECEIVED
03 OCT 28 AM 8:11
OFFICE OF THE
EXECUTIVE SECRETARIAT

695810

October 21, 2003

The Honorable Gale Norton, Secretary of the Interior, 1849 C Street Northwest, Washington,DC 20240 (202) 208-7351

Dear Ms. Norton,

Hello, my name is Wayland Lee and I live in the city of Rohnert Park, California since 1979. I am writing to you personally to solicit your help. The city of Rohnert Park is a family oriented community that has a wholesome "family friendly" atmosphere which is peaceful with family tract homes, nice parks, playgrounds, schools, and family catered community recreational activities which are ideal for raising children. Just outside of the Rohnert Park city limits, in a large area of land, the Federated Indians of the Graton Rancheria Tribe with the financial backing of Station Casinos, Inc. of Las Vegas, Nevada, plan to build a large 300 room hotel/casino/entertainment resort complex at the very border of this city located at Stony Point Road and Wilfred Avenue. The majority of the city's residents are alarmed at this proposed development which will threaten our way of life for many years to come. This proposed project, if authorized to proceed to completion, will bring some undesirable consequences to our city. They are: 1.) A significant increase in automobile traffic to our already congested freeways, roads, and streets, which increases the likelihood of accidents, 2.) An increase in crime, especially organized crime, 3.) Drunk driving incidents resulting from its 24 hour bar, 4.) Adverse impact on our city's limited water supplies and obligations, (Rohnert Park has limited well water supplies which the casino will have legal rights to seize.), 5.) An adverse moral image to our children and youth and the results it will bring in association with gambling. At several open hall City Council meetings, the majority (80%) of the city's citizens vehemently opposed the project and spoke out against it to our mayor and City Council members, saying that a gambling casino has no place in this family oriented city for the reasons already mentioned. However, the City Council did not even consider our concerns, but instead negotiated with the Tribe and Station Casinos officials in private back room "closed door" sessions without public input, comment, and vote, or impact reports for the sake of receiving millions of dollars in contributions from the Tribe to mitigate these impacts! And also, they have approved and signed the Memorandum of Understanding with the Tribe and Station Casinos in spite of our objections! The MOU states that "accordingly the city will agree not to oppose the tribe's efforts" in exchange for future promises of money! The majority of the residents felt betrayed by our City Council in this breach of trust by not representing the city and our concerns and interests for which they were elected. Even the city's police and firefighters are

695812

RECE

03 OCT 28

OFFICE
EXECUTIVE

1023 Santa Cruz Way
Rohnert Park, CA 94928
October 21, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Madam Secretary:

As a citizen of Sonoma County and the city of Rohnert Park, I am very concerned that The Graton Rancheria Tribe is attempting to purchase a large parcel of land just East of Rohnert Park in order to erect a Casino and large Hotel. Up until they moved to purchase this piece of land it had been designated as open space between populated areas and is actually a flood plane.

Now with the construction projected, at least one quarter of this flood plane will be taken up with buildings or parking lots. I spoke before the County Supervisors meeting and twice at the Rohnert Park City Council. All act like they have no power to stop this Tribe's actions.

Something seems absolutely wrong. If a County is to meet its goals of land use and plan, I don't understand why a Tribe can move in, declare the land a sovereign nation and take over irrespective of any general plan or ecological issues. No private enterprise would be allowed to even consider building on this land.

I understand you have power to look into this plan for a Casino and pass judgement on their desire to use this wetland and ignore the needs of the citizens of the surrounding communities. Please do something. I am completely opposed to this Casino being place in the proposed position. Please take action, where apparently we citizens have no power and even our local governments respond with fear and trepidation.

Sincerely,

Patricia F. Colton

Patricia F. Colton

695811

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03 OCT 28 AM
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EXECUTIVE SEC

(130)

1023 Santa Cruz Way
Rohnert Park, CA 94928
October 21, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Madam Secretary:

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Sincerely,

Alan F. Colton

Alan F. Colton

The Honorable Gale Norton
Secretary of the Interior
1849C Street Northwest
Washington D C 20240

October 20 - 03

T R Radovich
300 Enterprise Dr Apt 119
Rohnert Park CA 94928

136

The main reason I oppose the Casino in Rohert Park is the water and sewer. The deep wells will lower the water level for all who have wells. We already have a sewer prepem.

Thelma R. Radovich

Gridlock Highway 101 and nearby city streets with tens of thousands of additional cars and trucks.
Destroy valuable farmland and sensitive habitat that is home to rare and endangered plants and animals.
Harm local businesses by allowing casino advocates to build businesses that are exempt from local or state taxes, providing unfair competition to local merchants.
Be EXEMPT from local environmental, land use, criminal and other laws (since the tribe is considered a "sovereign" nation).

Once the casino is built, our city and our county would have NO CONTROL over future expansions, traffic, crime or any other issue related to the site.

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03 OCT 28 AM 8:11
OFFICE OF THE
EXECUTIVE SECRETARIAT
695813

695814

RECEIVE
03 OCT 28 AM
OFFICE OF T
EXECUTIVE SECR

Eileen Bybee
1305 Southwest #E
Rohnert Park, CA 94928

Oct 20, 03

The Honorable Gail Norton
Secretary of Interior
1849 C. Street Northwest
Washington, D.C. 20240

Dear Ms Norton:

I do not want a casino in my town. Rohnert Park should not have to provide the Indians with our scarce water. They should be able to make a living in our county without imposing this plan on our community. I oppose the casino.

Sincerely,
Eileen Bybee

143

My name is (Print) Ellen A Johnson

I live at 412 Corte Pintado, Rohnert Park, CA 94928

My telephone # is 707-584-9014

RECEIVED
03 OCT -7 PM 12:54
OFFICE OF THE
EXECUTIVE SECRETARIAT

694857

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Ellen A Johnson Date 9-28-03

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03 OCT -7 PM 12:54
OFFICE OF THE
EXECUTIVE SECRETARIAT

694657

695815

RECEIVED
03 OCT 28 AM 8:11
OFFICE OF THE
EXECUTIVE SECRETARIAT

138

October 17, 2003

The Honorable Gail Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Gail Norton:

I am writing this letter to express my concern about the proposed casino by the Graton Rancheria in Rohnert Park, California. Rohnert Park is in serious trouble because Las Vegas and the Graton Rancheria Indian Tribe are working to build the large Vegas-style casino. The voters have been duped into passing a measure to allow the tribes to build casinos a few years ago. The measure did not inform us that a tribe could secure any land as a reservation. I feel that some leaders are pushing the casino on Rohnert Park because they would prefer it to Graton's original site of protected wetlands. The casino will have impacts on our limited water supply, overused highway, and crime rate. Most seriously is our water supply. We are getting our water from a nearby city. The casino has proposed that they will drill their own well. This would cause our city serious water problems. Please help the residents of Rohnert Park. Many do not want the casino imposed on us. Our city council is turning a deaf ear on this communities opposition to the casino. I am in support of making reparations to the Indian tribes. But allowing them to take the 360 acre site on the outskirts of Rohnert Park would cause serious problems for our community.

Sincerely,

Terry Marshall

Terry Marshall
707-584-1814
6048 Diane Court
Rohnert Park CA 94928

990 Echo Ct.
Rohnert Park, Ca 94928

Oct. 13, 2003

695390

139

RECEIVED
03 OCT 21 AM 9:23
OFFICE OF THE
EXECUTIVE SECRETARIAT

Santa Rosa Press Democrat
Santa Rosa, Ca

Dear Editor:

I find it questionable why the Rohnert Park City Council voted 4 to 1 to vote for the Memorandum of Understanding without any meetings of dialog with the citizens of Rohnert Park, Pengrove and Sebastopol. John Muir"s quote is so applicable here, When you try to pick out one thing you find it attached to everything in the universe.

It is said, God writes straight with crooked lines. I voted against 1-A knowing well its implications. As someone so eloquently said at the Council Meeting held at the Spreckles Center on Oct. 12, there are alternative ways to make money.

When I was raising my children, someone said to me " **Listen, listen and listen again**" The Council did listen to the input of hundreds in opposition , but did they turned a deaf ear to the reality of the impact of water depletion, traffic and a community separator? Thank you Greenbelt Alliance , Sierra Club , The Owl Foundation and many respectful citizens for opposing this development.

Sincerely,

Eunice Edgington

Eunice Edgington
707.588.8971

CC: Gale A Norton, Secretary of the Interior

ES

140

RECEIVED
03 OCT 22 AM 9:13
OFFICE OF THE
EXECUTIVE SECRETARIAT

695437

Fax Transmission

Date: 10/20/03
To: Gale Norton
Secretary of the Interior
From: Sharona ES

Fax number: (202) 208-6956

Phone/fax: (707) 588-8729
Email: empowercoach@ureach.com

# of pages including cover page: 1

Senator Boxer,

I am sending this fax to state my opposition to the proposed Casino complex on 360 acres on Stony Point Road and Rohnert Park Expressway.

Traffic is congested right now without the Casino/Small City Complex going in. Traffic will get worst.....These are 2 line country roads.

Water is a big issue here. Rohnert Park recently had to reduce it's water consumption from 4.5-2 million gallons a day. The acreage filters through a good rainy season, 2 millions gallons/day. Paving over this land, the rain will have no way to get into the ground. The water table is getting lower year after year. The Casino Complex proposes to build two 1,000ft wells into the water table. This deplete wells and water for Rohnert Park, The Ridge, Penngrove, Cotati and Southwest Santa Rosa.

Since the casino complex will be governing itself, it proposes to have live musical venues starting at 10pm at night. How quiet will it be for those living around it?

This is not the appropriate place for a casino complex. I urge you to find another location for the casino complex that is well away from urban areas, residential areas, so it can be as big and loud as it wants. Please support Senate Bill 1342 and House Bill 2656 which would amend the Restoration act and give the Secretary of Interior discretion regarding taking land into trust.

Sharona ES 702 Racquet Club Circle, Rohnert Park CA 94928

141

ROBERT THOMAS
655 ENTERPRISE DRIVE
APT. 103 695468
ROHNERT PARK, CALIF.
94928

RECEIVED
03 OCT 22 AM 11:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

THE HONORABLE GALE NORTON
SECRETARY OF THE INTERIOR
1849 C STREET NORTH WEST
WASHINGTON, D.C. 20240

OCT. 16, 2003

DEAR SECRETARY OF THE INTERIOR
I, ROBERT THOMAS, BEING OF A SOUND MIND, DO HEREBY CONCUR WITH THE INFORMATION AGAINST THE CASINO, AND I TOO STAND IN OPPOSITION AGAINST THE CASINO AS WELL. MY REASON IS AS FOLLOWS. I AM A LICENSED RADIO BROADCASTER AND A MASTER CONTROL TELEVISION OPERATOR, WITH MORE THAN ENOUGH TO DO WITHOUT THE GRATON RANCHERIA TRIBE GIVING ME A HARD TIME. WE ARE NOT FOR SALE. STOP THE CASINO.

SINCERELY,
ROBERT THOMAS

October 15, 2003

695473

RECEIVED
03 OCT 22 AM 11:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

The Honorable Gale Norton
Secretary of the Interior
1849 C St. N.W.
Washington, DC 20240

Dear Honorable Norton,

I am writing to you to express my opposition to the casino going in near Rohnert Park. I am very concerned about our water supply, not only for the city of Rohnert Park, but for the homes along Wilfred Avenue and Stony Pt. Rd. I have a rental property on Wilfred Ave. which is my income. I am very concerned about the well water level, and also the added traffic on that street which would lead to the casino. I do not feel a 350-acre casino resort should be a part of our city or county and will adversely impact us.

Thank you for taking the time to read this letter and allowing me to express my opinion.

Sincerely,

Ruth L. Ward

Ruth L. Ward
305 Burton Crt.
Rohnert Park, CA 94928

202 APPLE LN.
ROHNERT PARK, CA.
94928-2602

RECEIVED
03 OCT 22 AM 11:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

695472

143

HONORABLE GALE NORTON,

MY WIFE AND I HAVE BEEN RESIDENTS (HOME OWNERS) OF ROHNERT PARK, SONOMA COUNTY, CALIFORNIA FOR TEN YEARS AND HAVE BEEN VERY PLEASED WITH THE GOOD QUALITY OF LIFE IN THIS COMMUNITY.

NOW WE ARE BEING FORCED TO BELIEVE THAT WE MUST ACCEPT AN UNDESIREABLE GAMBLING CASINO AGAINST OUR WISHES.

POLLS ARE INDICATING THAT WE ARE PART OF THE MAJORITY OF RESIDENTS HERE THAT ARE OPPOSED TO THE IDEA.

WE ARE HOPEFUL THAT YOU WILL USE YOUR INFLUENCE TO PREVENT THE OCCURRANCE OF THIS UNWANTED BUSINESS IN OUR CITY.

THANK YOU.

SINCERELY,
DONALD W. REED
ALICE H. REED

OCTOBER 15, 2003

10-9-03

144

RECEIVED
2003 OCT 22 AM 10:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

695469

Dear Honorable Dale Norton

I am writing about the casino in Rohnert Park of which we do not want or need - I don't need to tell you all the ramification's it will cause the biggest water, Crime, on + on. please tell us where the petitions are to sign we are going to try and go on the march Nov. 8.

Thank you!

Jan Nastrow
295 Circulo Puebla
Rohnert Park Ca.
94928

Oct 16, 2003

RECEIVED
03 OCT 22 AM 11: 1
OFFICE OF THE
EXECUTIVE SECRETAR

695470

The Hon. Gale Norton
Secy of Interior

Dear Mrs Norton -

I strongly oppose the Indian casino proposed for Rohnert Park. This is very much a family-oriented town and that has no place now or in the town's future.

PLEASE do what you can to block this!

Respectfully yours,
Dorothy L. Dreanger
4724 Fairway
Rohnert Park 94928

hood is changing. Many of the surrounding block alos are now using rocks, gravel, concrete where they used to grow grass.

We are doing our best to conserve water here.

My husband is part Cherokee. His great grandmother was on the trail of tears. This casino is not a racial issue. It is an environmental issue! We need our water here. Not a casino on our water table!

Thank you

Gloria Hafner Allen
752 Lindsay Ave Rohnert Park

Oct 15, 2003

RECEIVED
03 OCT 22 AM
OFFICE OF THE
EXECUTIVE SECRE

Dear Secretary of the Interior

I have lived in Rohnert park since 1987 and am a home owner. Water is an important issue out here. In a few years it will be the 'blue gold'.

We have had water shortages in the past out here.

I am against the Graton Rancheria tribe putting in a casino and taking up more water. Rohnert park has just put in water meters, my neighbor-

It's a smell we'd best get used to

Who could deny that there's much about the fancy-casino plan that the Rohnert Park City Council has signed onto that stinks like a tallow-factory?

There's the oversized scope of the project, the politics and bedfellows, the possible water and traffic and law enforcement impacts and on and on. But it's beyond argument that the thing is going to be built somewhere, and that there's no ideal location, and that the Federated Indians has cut a respectable deal with a city it could have told to go pound sand.

Opponents are fighting the good fight, but the four council members deserve credit for holding their noses and dealing with the inevitable.

4-1 vote for $200 million deal w

"We don't want to be bought, and we will not accept this at all."

LARRY ESPARZA
Casino opponent

"We are not leaving."

GREG SARRIS
Tribal chairman

By **CLARK MASON**
THE PRESS DEMOCRAT

Brushing aside the threat of a recall, the Rohne Park City Council on Tuesday gave final approval t a $200 million revenue sharing deal with a Nort Bay Indian tribe that plans to build a casino on th city's west side.

On a 4-1 vote, with Councilman Jake Mackenzi dissenting, the council approved the agreement wit the Federated Indians of Graton Rancheria to com pensate the city and community groups $200 millio over 20 years to offset the impacts of the casino.

The vote capped a nearly five-hour meeting befor an overflow crowd at the 500-seat Spreckels Perform ing Arts Center. Most of the 80 speakers who cam before the council opposed any deal with the trib and lambasted council members for failing to figh the casino.

Council members said they had little choice but t accept the tribe's offer.

"They are a sovereign nation and consequently they don't need the city's permission to build," said Councilwoman Amie Spradlin, reflecting the majority sentiment of the council. She called the decision a tough choice, but best for Rohnert Park and for gen-

TURN TO **CASINO**, PAGE A15

147)

695586

392 Circulo La Cruz
Rohnert Park, Ca.

RECEIVED
03 OCT 22 P
EXECUTIVE SECRETARIAT

October 16, 2003

Dear Ms Norton:

I'm writing to ask you for help in stopping the building of an Indian Casino on the edge of our small city of Rohnert Park, California. There are many, many acres of empty land in this area which makes it seem very unfair and unreasonable that this, largest of all, the 53 Casinos would be built in our front yard! This is a lovely community with mostly schools, churches and parks and the Casino will bring many problems with traffic, noise and other environmental issues.

Will you please help us put a stop to this being built at this location?

Thank you very much,

Marion Mauer

CASINO: Oppone[illegible]olution

CONTINUED FROM PAGE A1

erations to come.

Casino opponents have organized to try to recall council members who supported the casino.

Mayor Armando Flores said even if he is recalled, he believes the casino will be a reality and it is more important to do the right thing and approve the agreement with the tribe.

But Mackenzie blasted Flores and City Manager Carl Leivo for the way they dealt with the negotiations, including a series of closed-door meetings that led to the agreement.

He said he has made a formal complaint to the Sonoma County grand jury to investigate how the deal was reached, contending the process was flawed from the beginning and symptomatic of the way city government has been run since December, when a longtime city manager was replaced.

[illegible] Flores and other council members have defended the pri[illegible] negotiations with the tribe [illegible] Station Casinos [illegible] Vegas, concluding it [illegible] been done in [illegible] the contentious issue.

[illegible] contentious [illegible] tonight [illegible] war in [illegible] Park [illegible] City [illegible] have be[illegible] the nth de[illegible] want the blood money, and we don't want to be bought, and we will not accept this at all," he said.

Speakers urged council members to fight the deal. But tribal leaders said they have no intention of building their casino [illegible] else.

"[illegible] are not leaving," said [illegible] Chairman Greg Sarris, [illegible] the tribe considered [illegible] before deciding [illegible] Park.

[illegible] staked out positions, [illegible] times raucous crowd [illegible] by Leivo that people could face arrest if they [illegible] or engaged in disruptive behavior.

At least 10 members of the audience were unruly enough to [illegible] escorted out by police officers, although no one was arrested. Some speakers left the podi[illegible]

D. L. MAURER
Property Tax Consultant
392 Circulo La Cruz
Rohnert Park, California 94928

The Honorable Gale
Secretary of the Interior
1849 C Street N.
Washington, D.C. 20

[illegible] The scores of speakers in[illegible] ed supporters of the ca[illegible] who said it will bring [illegible] than 2,000 well-paying jo[illegible] the city. Members of a hal[illegible] en unions, ranging from pl[illegible] ers to operating engineers, [illegible] tricians and hotel and res[illegible] rant workers, applauded [illegible] good will of the tribe and [illegible] economic boost the fac[illegible] would bring to the city.

Opponents voiced famili[illegible] complaints: that the casino a[illegible] hotel resort will create traffic congestion, increase crime and does not belong on agricultural land.

They said the city had no right to fast track what some called the most important deci[illegible] [illegible] because many of the crucial decisions had been made in closed-door meetings.

Sarris told the audience that the debate on the casino had been plagued by ignorance and sometimes hurtful and "extremely racist comments."

But other speakers disavowed any racist sentiments and said they simply oppose any type of intense development on the site northeast of Rohnert Park Expressway and Stony Point Road.

Avowed casino opponent Anita Felton criticized the city's agreement with the tribe because it required city officials to not fight the casino.

"They moved from Sears Point and they can move from Rohnert Park," she said.

But Sarris said the tribe moved from Sears Point in a gesture of cooperation and no[illegible] because opponents "scared us away."

Critics say the agreement is flawed because the tribe can back out if it does not receive the number of slot machines it wants or the gaming compact it desires from the state.

But Flores called it "a very impressive document." He said that "only under very unique circumstances would the agreement not be binding on either party."

[illegible] tribe is offering to share [illegible] $200 million with [illegible] and community [illegible] a variety of im[illegible] casino.

[illegible] agreement the [illegible] the city's [illegible] on pub[illegible] additional [illegible] marked for [illegible] the Co[illegible] Dis[illegible] neigh[illegible] bene[illegible] prof[illegible] par[illegible] would [illegible] pay [illegible] ment [illegible] sporta[illegible] million for [illegible] fire station [illegible] plans a [illegible] would be [illegible] Sonoma County.

Also on Tuesday afternoon, several casino opponents called on county supervisors to adopt an emergency resolution against the casino, which they said would help convince the Rohnert Park City Council it should reject a revenue-sharing agreement with the tribe.

Supervisors said they expect to adopt a resolution next week opposing the casino after they receive more information about the amount of traffic it will generate.

Staff Writer Spencer Soper contributed to this report. You can reach Staff Writer Clark Mason at 521-5214 or cmason@pressdemocrat.com.

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OFFICE OF THE
EXECUTIVE SECRETARIAT

695132

Debbie Fleckenstine
1310 Gaspar Ct
Rohnert Park, CA 94928

148

Oct 6, 2003

Gail Norton
Secretary of the Interior
1849 C. Street Northwest
Ms-4140-MIB
Washington, DC 20240

Dear Ms. Norton,

My family has lived in Rohnert Park, CA for over seventeen years. My husband and I moved to this city to raise our children in a quiet, small town. We picked Rohnert Park because of its neighborhood schools and its many parks. Our children have always felt safe here. I am strongly against any casino, Indian or otherwise, being built within our city limits. I feel it is entirely contrary to the "Friendly City" atmosphere here and will only bring additional problems, such as crime, more traffic and pollution. We are already experiencing trouble with our water supply and sewage capacity. We simply cannot accommodate the extra congestion and draining of resources that this proposed casino facility would bring.

I also object to the "behind closed doors" meetings that took place between some of our city leaders and the casino representatives. We were sold to the Federated Indians of Graton Rancheria without ever being consulted. Our City Council and its circle or "good ol' boys" just saw dollar signs, and failed to view the inevitable environmental and social damage that such a development will bring about. The majority of this community does NOT want gambling in our midst. If we did, we would have moved to Las Vegas or Reno. Casinos do not belong is small towns.

Sincerely,

Debbie Fleckenstine

Debbie Fleckenstine

Cc:
Barbara Boxer
Dianne Feinstein
Lynn Woolsey

149

10-4-03

Dear Gail,

I'm writting in regard to the Indians of Graton, wanting to build a casino here in Rohnert Park. This is an area of senior citizens like myself (81) only 42,000 residents. What we don't need is a casino in this area.

Please whatever you can do to stop this please, please, do. Not for only me but my grandchildren & G. Grandchildren. It will destroy this area.

Thank you

Sincerely

Margaret Munkres &

Leo Tognozzi

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OFFICE OF THE EXECUTIVE SECRETARY

Mr. Leo D. Tognozzi
Margaret Munkres
4447 Hollingsworth Cir.
Rohnert Park, CA 94928-1449

150

Chuck and Mary Thayer
October 3, 2003

Gail Norton
The Secretary of The Interior

Hello;

We have owned a home in Rohnert Park since the mid seventies. Since we moved here, Rohnert Park has gone from a very nice planned community to a sprawling small city. We have now outstripped our water and sewage capacities and the traffic here is now a nightmare.

We **do not** want or need a casino in Rohnert Park that will further strain our resources and bring us a myriad of new problems.

Please do not allow the Nevada gambling interests and the developers to force their Agenda on by using a native American tribe as a front.

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EXECUTIVE SECRETARIAT
6947977

Thank you very much,

Charles F. Thayer

Mary J. Thayer

7146 Barbi Ln.
Rohnert Park, Calif.
94928

151

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695252

03 OCT 20 AM 8:40

EXECUTIVE SECRETARIAT

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE
WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME TAMI CARTER

ADDRESS 405 HORN AVE, SANTA ROSA, CA

SIGNATURE

DATE 10.12.3

I will be candid, however. I have some concerns about limiting the sovereignty in the area of the Indian Gaming Regulatory Act. Mr. Sarris, have you—have other Indian tribes in California expressed any concern about the fact that you're willing yourself to not exercise that right under IGRA?

Mr. SARRIS. There has been some concern, yes, from some tribes mentioned, but the majority of the tribes nonetheless support our move. In fact, we have letters of support from the neighboring Pomo Tribes.

Another thing I should mention is that as a result of Proposition 1 A in California, one of the provisions or stipulations is that tribes cannot establish gaming on newly acquired trust land. So if we were to establish or find a larger tract of land where we could have gaming, we couldn't have it.

But more importantly for us, also part of the provision of Proposition 1 A is that non-gaming tribes can share, have profit sharing in the profits from the gaming tribes. But unless you're recognized, you cannot have access or we will not have access to the profit sharing with the gaming tribes.

Mr. KILDEE. Let me ask you this, because I really am anxious to recognize your sovereignty.

If this legislation was silent about IGRA, would the California law still forbid you then to have gaming on that one acre of land or is that something lawyers have to sort out later?

Mr. SARRIS. Well, technically no. I mean technically we could have gaming on the one acre but in fact we have made an agreement with the woman living on there that we would not do that on her one acre that she has retained. She has expressed that she did not want that in any way and only wanted her home—you know, there is a little home, her little home that she has retained there—used for historic and cultural purposes.

Mr. KILDEE. But that land would become your land and it would be sovereign land?

Mr. SARRIS. The one acre, yes, sir.

Mr. KILDEE. One acre would be sovereign land. I am just asking these questions because I am really anxious to recognize your sovereignty. You know, we have had tribes in Michigan. I helped get the recognition of five different tribes. We have 12 tribes in Michigan, pretty small tribes.

One was—two, three were down to zero acres of land and I helped get them land also, maybe only about 300 acres but—which by Western standards but obviously not California standards was a fairly good chunk of land, so there are other instances where land has been—Burt, the land in Michigan was illegally taken from the Indians. Burt Lake, 1901, the Governor put them back on the tax rolls for that band and after one year when they did not pay their tax, did not tell them they were back on the tax rolls, they were illegally put back on, confiscated their land because the lumber barons wanted it.

They came in—this was 1901, this is not, you know—my dad was 18 years old. He remembers when it happened. They came in and the Sheriff burned down, chased the Indians off the land, burned down their village so they could not return. Some terrible things have happened to Indians and I think that we in the Congress have not just a legal but a moral obligation to right these wrongs as much as we can.

I certainly appreciate both of you testifying here today. Thank you, Mr. Chairman.

Mr. GILCHREST. Thank you, Mr. Kildee. Mr. Sarris, Congresswoman Woolsey, thank you very much for your testimony and we will do what we can to—I guess you are not going to use that for grazing too many horses or cattle, but maybe you can expand it later on.

story casino on one acre, it's unlikely.
Mr. GILCHREST. So, one acre, which will be a site for, among other things, family reunions, I guess?
Mr. SARRIS. Family reunions and a place from which we can educate the larger community about who we are, and, again, house historical information and the things that we would like to keep as a tribe for our children and grandchildren.
Mr. GILCHREST. Now, will the—so, there are 380 people that consider themselves southern Pomo or Indians of Graton?
Mr. SARRIS. Yes, Coastal Miwok.
Mr. GILCHREST. So, do they all—they're in the area. They're all working. There is no—we're not talking about a Navaho Indian Reservation here, the Sioux Indian Reservation, or anything like that.
So, the specific designation would do what for the people that are disbursed? They would receive the same benefits as the other Federally-recognized tribes?
Mr. **SARRIS.** Once again, we would have access to health benefits, many of which you heard about this morning earlier. We have no access to that, and yet we have the same problems in high incidence of diabetes and so forth.
We cannot get the help from any other Indian agencies. Also, we would be able to apply for scholarships and fellowships as Indians, where at this point we cannot because we're not recognized as a Federal tribe.
Mr. **GILCHREST.** Where would you have access to health care, a traditional doctor's office, a health care facility?
Mr. **SARRIS.** We have a health clinic, Sonoma Indian Health right in there that's enjoyed by other tribes.
Mr. **SARRIS.** I see. Mr. Kildee?
Mr. **KILDEE.** Thank you very much, Mr. Chairman. I think really the main benefit, aside from the fact that you are sovereign and you have a retained sovereignty, we're not giving it to you, we're recognized that retained sovereignty, and that's John Marshall's decision that you hold a retained sovereignty.
We are not giving it to you by this bill; we're recognizing that retained sovereignty, and that's a very, very important distinction there, a very substantive distinction.
The main gain that you would get by that recognition would be access to Indian Health Service and education. Were you in Michigan—when I was in the Michigan Legislature, I

introduced a bill that any Michigan Indian can go to any Michigan public college without paying tuition. It's called the Indian Tuition Waiver Act.
And that was—I know that's probably not the law in California, but there are certain rights that accrue to you when you are a recognized Federal tribe. Again, I want to emphasize recognition, not granting your sovereignty, recognizing your retained sovereignty.

That's a—I carry with me wherever I go, I carry John Marshall's decision and I carry the Constitution. John Marshall's decision talks about the retained sovereignty, and this talks about your—the three types of sovereignty.
I will just read this: Congress shall have the power to regulate commerce with foreign nations, and among the several states, and with Indian tribes, recognized as the three sovereignties.
That's very important. Whether you have one acre or like the Navaho, you are—the fact that you have that sovereignty recognized, that you exercise your natural rights as a sovereign people, and that's very important. That's why this bill is very attractive to me.

which we resided on small rancherias or privately-owned property.
We were still generally referred to by the derogatory term of digger Indians. In 1920, after looking up and down the coast at our territory, 15.45 acres were purchased in Graton for our members. Seventy-five members moved on in 1920.
Unfortunately, of those 15.45 acres, only three were inhabitable; the rest were virtually up and down, so many of our members could not stay there.

In 1958 when they came by and did a census at the height of the harvest season, when no one was around, they found three families and with the Rancheria Termination Act, offered those three families or three designees, the right to buy the land, and, in essence, terminate the rancheria as trust land and, therefore, terminate us as—our tribal status as a recognized tribe.
That was not settled until 1966, at which point there was one family left, and that family got the land. We were then, as Lynn mentioned, Congresswoman Lynn Woolsey, terminated, effectively as a tribe, without the vote or the consensus of the rest of the members.
Due to taxes and what have you, that family was able to hold on to only one acre of that land. A woman, the daughter of the designee, who still lives on the land, has given it to us as a token to restore to trust status, the tribal lands, and, in turn, restore us as a tribe.
Congresswoman Lynn Woolsey mentioned the issue of gaming. We worked closely with both the Democrats and Republicans there who did not want development on the land.
I, for one, and I think I can speak for many people of my tribe, feel strongly that Indian people should have the sovereign right to game. It isn't that issue; it's working together with our group, that we did not want to develop the land for casinos or any other purposes.
What we are asking is for our rights to be returned; that is, our rights to health benefits, education benefits, and housing benefits that are afforded all other recognized American Indian tribes.
And as I mentioned, we were terminated in 1966. As you know, since that time, American Indians have made some significant gains in terms of health and education. We would like access to some of that, and we would like once again to be restored as a people and have rights that we once had so that we might not be as we were before 1920, simply homeless Indians of California.
Thank you.
[The prepared statement of Mr. Sarris follows:]

Mr. GILCHREST. Thank you, Mr. Sarris. How many—that's an interesting but sad story that's covered, I guess, several centuries, to descend to 12 survivors and now, I guess, ascend to 380, which is quite remarkable.
How many acres does the bill set aside?
Mr. SARRIS. Approximately one acre, sir.
Mr. GILCHREST. One acre?
Mr. SARRIS. Yes.
Mr. GILCHREST. Now, where are the 380 enrolled members? Do they live in the area?
Mr. SARRIS. They live throughout Sonoma and Marin, southern Sonoma and Marin Counties, in and around Santa Rosa in private homes. We have no place to live. We've been gathering in front rooms and garages for our meetings.
Mr. GILCHREST. You're asking for one acre?

Mr. SARRIS. One acre.
Mr. GILCHREST. Even if you wanted a casino, it would be a pretty small casino.
Mr. SARRIS. Mr. Chairman, unless we could get an architect that could build an 87

to our community that their quest for restoration is not to establish gaming.
And, most importantly, it is a request for their right to self-determination. As the Federal representative for the area where their tribal land will be established, I'm very proud that this bill addresses their wants and needs as well as the rest of the residents of the vicinity.
Interesting enough, my office recently received a visit from the San Manuel Band of Mission Indians that are located near San Bernardino, California.
They operate gaming on their lands, but they were proud to learn that the Federated Indians of Graton Rancheria were asserting their right to make a sovereign decision about their tribe's future.
Mr. Chairman, I'd like to enter into the record, a statement of support for H.R. 946 from this particular tribe.
Mr. **GILCHREST.** Without objection, so ordered.

Ms. **WOOLSEY.** Thank you. And, Mr. Chairman, it's been a long journey for the Federated Indians of Graton Rancheria, and on behalf of their hard work and the support they have received from the local community, I ask that this Committee hold the markup of H.R. 946 and bring this bill to the Floor for consideration so that we can restore the deserved recognition that they request.

I thank the Committee again for the opportunity to testify in support of restoration for the Federated Indians of Graton Rancheria, and I look forward to a continuing working relationship with this Committee on their behalf. Thank you very much, Mr. Chairman.
[The prepared statement of the Honorable Lynn C. Woolsey follows:]

Mr. **GILCHREST.** Thank you, Ms. Woolsey. We will do our best to expedite the bill.
Mr. **SARRIS?**
STATEMENT OF GREG SARRIS
Mr. **SARRIS.** First of all, thank you, Mr. Chairman, for rearranging the order of speakers here right now. It took a lot of fried bread sales from my people to get me here today, and I've got to catch a plane back.
Let me give you a little bit of background, everybody here, about the tribe. The Federated Indians of the Graton Rancheria were called by the 1920's 1930's, Coast Miwok or Southern Pomo by linguists and anthropologists.
At pre-contact time, we were approximately 5,000 people of many—several dozen bands of Indians who interacted as one group.
Today we have 380 enrolled members. Of those members, 380 members, we are all descendants of 12 survivors.

We were first contacted by, of course, the Spanish, who put us in the missions. The northernmost missions were in our territory, and then the Mexicans who established an elaborate slave trade situation that enslaved virtually all our men and traded them as far as Mexico, back and forth on the ranchos.
In 1850, when California became a State, one of the first pieces of legislation that was enacted by the State of California was the Act for the Government and Protection of Indians which, in essence, legalized Indian slavery.
It stipulated that Indians became the rightful property of whomever's land they were on. We were bought and sold until that law was repealed in 1868, three years after the Civil War.
For the next 50 years, we lived as indentured servants on whomever's ranch we were on.
In the early part of the 20th Century, the BIA began purchasing small tracts of land for the so-called homeless Indians of California. They did not designate us by tribes, but by areas in

show that two of the four leaders of the Native American Caucus are still with us today, so thank you for your interest in our Native Americans and for sticking in here with this.
I'm pleased to be here today to testify in support of H.R. 946, the Graton Rancheria Restoration Act. It's also a great privilege to sit here with Dr. Greg Sarris, who is the Chair of the Federated Indians of Graton Rancheria. He was supposed to be on Panel II. Thank you for putting him next to me so he can catch a plane. He's barely going to make it. Together, we've worked for several years on this bill. And on behalf of Greg and on behalf of the tribe, I appreciate your hearing us today, and allowing us to speak.
The bill before you today, H.R. 946, seeks to correct a decades-old wrong by restoring Federal recognition for the Federated Indians of Graton Rancheria.
Composed primarily of the California Coast Miwok and Southern Pomo tribes in my Congressional District, which you know, Mr. Chairman, is north of San Francisco, across the Golden Gate Bridge.

Joe Saulque, who chaired the Advisory Council on California Indians, stated that lack—no, not lack—luck often determined whether a tribe got recognized.
And I am so glad that with today's hearing, we are going to take luck out of the equation by taking the first step in restoring the tribe's status, because it is the right thing to do. It should not be based on luck.
The tribes of the Graton Rancheria are a rich part of the San Francisco Bay Area's cultural heritage. The earliest historical account of the Coast Miwok peoples whose traditional homelands include the California communities of Bodega, Tomales, Marshall, and Sebastopol, located along the West Coast of my District, dates back to 1579.
Today there are approximately 380 members of the Federated Indians of Graton Rancheria. In 1966, the U.S. Government terminated the tribe's status under the California Rancheria Act of 1958. Almost two decades later, the Advisory Council on California Indian Policy was established by the Congress to study and report on the special circumstances facing California's tribes, those whose status had been terminated.
The Council's final report, which was submitted to Congress in September 1997, specifically recommended the immediate restoration of the Federated Indians of Graton Rancheria. Following this report's recommendations, the tribes promptly decided on a course of action for the restoration. Since then, I've been working with them on the bill.
And it's the bill that's before you today. This consensus bill restores Federal rights and privileges to the tribe and to its members.
As is typical with restoration legislation, it reinstates political status and makes tribal members eligible for benefits such as Native American health, education, and housing services. These are services, as you know, that are available to all other Federally-recognized tribes.
A unique aspect of H.R. 946, however, is that it specifically contains a clause that restricts gaming, gaming on land that is taken into trust for the tribes.
This non-gaming clause is at the express request of the tribe, and is the basis for the broad and bipartisan support that this bill enjoys throughout my Congressional District.
It is also key to my support for the tribe's restoration. As most of you know, I'm privileged to represent an area with unparalleled natural beauty. Open space, controlled growth, and quality of life are defining characteristics and values for the residents of Marin and Sanoma Counties. Greg Sarris, and the tribes recognize and appreciate this because they live there also. They are also acutely aware of the growing pressure on restored Indian tribes to establish gaming as a means of economic independence.
Their sovereign decision—and I repeat, sovereign decision—to choose other means of economic vitality is out of respect for preserving the current character of the North Bay, and a commitment

The Federated Indians of Graton Rancheria will hold a discussion on tribal issues and talk about its future plans on Thursday, March 16, at 7:15 p.m., at the Hamilton Community Center (formerly the Officer's Club at the Hamilton Army Base), 203 El Bonito Ave., Novato. 763-6143.

From the March 9-15, 2000 issue of the Sonoma County Independent.

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EXCERPT FROM:

H.R. 946, H.R. 2671, AND H.R. 4148 (YOUNG, R09AK)—TO MAKE TECHNICAL AMENDMENTS TO THE PROVISIONS OF THE INDIAN SELF09DETERMINATION AND EDUCATION ASSISTANCE ACT RELATING TO CONTRACT SUPPORT COSTS, AND FOR OTHER PURPOSES. "TRIBAL CONTRACT SUPPORT COST TECHNICAL AMENDMENTS OF 2000".

OVERSIGHT HEARING

before the
COMMITTEE ON RESOURCES
HOUSE OF REPRESENTATIVES

ONE HUNDRED SIXTH CONGRESS

SECOND SESSION

MAY 16, 2000, WASHINGTON, DC

Serial No. 1060995

Printed for the use of the Committee on Resources

Mr. **GILCHREST.** Thank you, Mr. Smith. Gentlemen, thank you very much for your testimony, and we look forward to working with you on this bill to see it passed as soon as possible. Thank you very much.
Now, there's a little—as far as I can see, slight alteration in the next panel. Ms. Woolsey, the Congresswoman from the great State of California, and Mr. Greg Sarris, Chairman, Federated Indians of Graton Rancheria Novato, California. Ms. Woolsey and Mr. Sarris, welcome.
Ms. Woolsey, you may begin.
STATEMENT OF THE HONORABLE LYNN C. WOOLSEY, A REPRESENTATIVE IN

CONGRESS FROM THE 6TH DISTRICT OF CALIFORNIA; AND MR. GREG SARRIS, CHAIRMAN, FEDERATED INDIANS OF GRATON RANCHERIA, NOVATO, CALIFORNIA
STATEMENT OF THE HONORABLE LYNN C. WOOLSEY
Ms. **WOOLSEY.** Thank you, Mr. Chairman, and thank you. I'd like for the record to

"Robert *Redford* returns my calls, and Woolsey's office doesn't," he gripes.

Calling the *Sonoma County Independent* from Woolsey's Washington, D.C., office, Woolsey's press secretary, Heather Brewer, says that the bill "was introduced on March 2, 1999. It was referred to the House Committee on Resources, and that's where it still is. It's been a big issue for [Woolsey}, but with the Democrats in the minority, it's hard to gets something like this through, because we're at the mercy of the Republican leadership." In the meantime, the tribe is intent on preserving cultural traditions through the creation of a living-history museum at Olompali State Historic Park in Novato.

For the past five years, Coast Miwok descendants and volunteers have gathered regularly at the wooded site six miles south of Petaluma to reconstruct a small replica of what was once a thriving Native American trading village.

It includes dwellings called *kotchas*, which have willow or wooden frames and are lashed with tule reeds, a flexible, bamboolike covering. Additional construction includes cross-pole and brush sunshades, an acorn granary, a tule drying rack, and a dance circle. Unlike Kule Loklo, a similar Miwok village at Point Reyes National Seashore, the Olompali site is being built by the Miwoks themselves.

Buvelot says the project is in response to the fact that more baby boomer-aged Native Americans are searching for a sense of cultural identity. "During the teenage years there's a loss of interest, and [when they're] in their 20s and 30s you start seeing them appearing at the meetings," says Buvelot, who practices traditional flint work.

"I could kick myself because when I was a teenager I didn't pay that much attention to my grandmother and her sisters, who were some of the last fluent speakers of the language. If I had, I'd probably be speaking it fluently right now."

In addition to setting up an economic base, the tribe, once recognized, plans to establish a permanent cultural center. "We have a lot of things passed down from our families but no safe place to keep them," says Buvelot. "If we had a place we could call our own on our own land, it would be great."

TRIBAL OFFICIALS are optimistic that a Native American revival in the North Bay will occur once the tribe is restored and as the possibility of establishing its own sovereign government comes closer.

Sarris believes that learning about Native American culture is important for the entire local community. "Even though we don't ride appaloosa horses and wear braids today, we're still Indians. We know the stories. I see landmarks like a tree, a rock, a site, or even where a parking lot stands today, and I know where somebody was murdered, I know where a fight took place, where a baby was born, I know where coyote tricked porcupine," he says. "The landscape is alive and the environment was our bible, and the way in which we read and remembered our history.

"We still know that, and it's one of the unique things we still have to offer."

Buvelot adds that the objectives of the Federated Indians of Graton Rancheria are simple: "Our goals are to be self-sufficient with some sort of economic development and to achieve the benefits available to all other tribes," he says.

"And to finally come out of the shadows."

their political status, and makes them eligible for benefits available to other federally recognized tribes, including health care, educational scholarships, and housing services.

A special clause in the bill states that politically explosive gambling will not be allowed on tribal lands affected by this particular bill. But, according to tribal officials, that's all in flux because a second bill is on the horizon that, if passed, would give the Federated Indians of Graton Rancheria gaming rights.

On March 16, the group plans to officially introduce itself to the community and unveil its future plans.

Touted as a historical event, the Novato meeting, sponsored by the Miwok Archeological Preserve of Marin, will allow the public and government officials from Marin and southern Sonoma counties to address tribal issues.

Tribal officials, including the group's chairman, noted author and educator Greg Sarris, of Miwok descent, will be present to provide information about the tribe and answer any questions concerning its past, present, and future plans in the region.

"This [tribe] will be a political unit to disseminate cultural and historical information in a much louder, more vocal, and effective way," explains Sarris, an English professor at the University of California at Los Angeles. "We want to send someone from the tribe into schools and have someone who can sit on the [state and county] park boards."

Buvelot says once the tribe is restored, the next step is to find land (the parcel in Graton is apparently too small to be used) to become a functional rancheria, which could be anywhere in the tribe's extensive historical territory. The goal is then to create some sort of economic development.

And, yes, gambling could still be in the cards.

"I don't want to start rumors--one of the fears of a lot of people is probably casinos," Buvelot says. "If we're a sovereign tribe, we have all the rights of any other tribe. And if it's the wishes of the tribe to go that way, then they can. But that will be brought up at the meeting.

"[Gaming] is not ruled out."

He refuses to say more about the subject, adding that tribal officials will elaborate during the meeting. "We'll be prepared with answers," he promises.

Although the group has been approached by "countless" gaming and nongaming business ventures, because the tribe is better located for a business interest than any other in the Bay Area, Sarris thought Woolsey would have pushed the bill through quickly because of its anti-gaming clause. She hasn't. Now, Sarris says, another bill being drafted by the federal Bureau of Indian Affairs and involving seven tribes, including the Federated Indians of Graton Rancheria, *would* allow local gaming.

"This won't please Woolsey's constituents, because they don't want a gambling casino in Petaluma or San Rafael," he says.

Sarris--who penned the critically acclaimed books *Grand Avenue* and *Watermelon Nights* and is something of a celebrity himself after his remembrance of growing up on Santa Rosa's Grand Avenue became an HBO mini-series--is "more than a little frustrated" by what he calls the slowness of Woolsey's office.

Complete text of article from the Metroactive section of *The Sonoma County Independent*, March 9-15, 2000 edition

Tribal Spirit

Upsurge in local Native American political and cultural activity

By Paula Harris

CHANCES ARE you haven't yet heard of the Federated Indians of Graton Rancheria--southern Sonoma County and northern Marin County's only local Native American tribe. But you're about to. "*We are still here!*" is the message from the tribe, formerly known as the Federated Coast Miwoks, which is on the verge of gaining federal recognition under its new moniker: the Federated Indians of Graton Rancheria.

Tribal officials claim their people and their rich cultural heritage have been passed over for too long.

Gene Buvelot, a tribal elder and vice chairman of the Federated Indians of Graton Rancheria, recalls an incident several years ago at the Point Reyes National Seashore (which features a reconstructed Coast Miwok village) that he says demonstrates the problem. "I was standing behind a group, and a ranger was telling them there's no longer any Coast Miwok around. They were saying I was extinct," he exclaims incredulously. "I had to step forward and say, 'Excuse me!'

"A lot of people still don't know we exist; they keep thinking of us in the past. It's like we're in the shadows," he adds. "But we're here, and we're a vibrant community."

The earliest historical account of the Coast Miwok people--whose traditional homeland stretched as far north as Bodega Bay and as far east as the town of Sonoma and included all of present-day Marin County--dates back to 1579. The group's federal status as a recognized tribe was terminated in 1966 under the California Rancheria Act of 1958.

The upsurge began more than five years ago, when the Coast Miwoks filed a petition with the Bureau of Indian Affairs to begin the lengthy federal acknowledgment process and thus gain certain benefits. The group was spurred into action when Cloverdale Pomo leader Jeff Wilson unsuccessfully attempted several times to establish gaming facilities, including a multimillion destination resort and casino just south of Petaluma on what the Coast Miwoks claimed was their territory.

In the interim, the Miwok tribe discovered a small parcel of land in Graton that had been set aside as a reservation area for the local Miwoks in the 1920s. This discovery of their own land, albeit now only about an acre, allowed the group to switch from a federal recognition process to a restoration process, which requires an act of Congress.

THE TRIBE, which rents an office in Petaluma, changed its name to the Federated Indians of Graton Rancheria, so that it could include various families from different locales. It has about 370 members.

Last March, Rep. Lynn Woolsey, D-Petaluma, introduced legislation to restore federal recognition for the Federated Indians of Graton Rancheria, which is now composed primarily of the Coast Miwok and southern Sonoma County Pomo groups. The bill, the Graton Rancheria Restoration Act, restores all federal rights and privileges to the tribe and its members, reinstates

Mr. Kildee, Chairman Sarris' performance at the Hearing over which you presided was intended, I believe, to deceive the Committee in order to forward the tribe's recognition, knowing that Senator Boxer's subsequent bill would allow them to engage in gaming. And I suggest to you that gaming has been the tribe's intent since the beginning.

I urge you to call Chairman Sarris into account for the blatant misrepresentations he made to your Committee. It is inconceivable that this man be allowed to lie to Congress and walk away with no consequences. I hope you will take prompt action to hold Mr. Sarris accountable for his deception.

Very truly yours,

Marilee Taylor Montgomery

/mtm

cc: Hon. Lynne Woolsey
Hon. Dianne Feinstein
Governor-elect Arnold Schwarzenegger
Honorable Linda Kelley
Honorable Orrin Hatch
Honorable Gale Norton
Honorable Aurene M. Martin

Gilchrest, promising repeatedly that the tribe would not seek a casino. He also told your committee that California's Proposition 1A didn't allow casinos to be built on newly-acquired lands. That statement was a blatant fabrication. Proposition 1A, which had passed in March of 2000 has very simple language that nowhere refers to casinos on newly acquired land. The proposition appeared on the ballot as follows:

- Modifies state Constitution's prohibition against casinos and lotteries, to authorize Governor to negotiate compacts, subject to legislative ratification, for the operation of slot machines, lottery games, and banking and percentage card games by federally recognized Indian tribes on Indian lands in California, in accordance with federal law.

- Authorizes slot machines, lottery games, and banking and percentage card games to be conducted and operated on tribal lands subject to the compacts.

This is the exact verbiage from the California Secretary of State's website. The amendment as it appears in the California Constitution differs very little from this. As you can see, there is no injunction against newly-acquired tribal lands being used for casinos. Greg Sarris is a very well educated man. It is unlikely that he misunderstood the simple language of a ballot initiative so important to his tribe.

Mr. Sarris also told you that his tribe held fry-bread sales to pay for his trip to Washington. At the time he appeared before your committee, he was a twice-published author, a lecturer on the national circuit, and a professor at UCLA. He lives in Topanga Canyon on Wonderland Avenue, an expensive neighborhood. The tribal council consisted of middle-class working people, which is what the tribe in general is comprised of, since these folks have been living and working in the area for generations, as self-reliant, fully integrated members of society. I find it difficult to believe that between the Chairman and the council, they could not have come up with the price of a trip to Washington without resorting to "fry-bread sales". I suggest that this comment was a deliberate attempt to misrpresent both his circumstances and that of the other tribal members, in order to elicit sympathy from you and Congressman Gilchrest.

The tribe now plans to build, in partnership with Station Casinos, a sprawling, Las Vegas-style casino with 2,000 slot machines, multiple restaurants and fast-food outlets, a 2,000 seat music venue, convention center and 300 room hotel and spa. They have chosen, after some very dirty back-room deals, a piece of land just outside the small "family-friendly" town of Rohnert Park, CA. Although the announcement was first made on April 29, 2003, you and I both know that deals of such magnitude take months and months of negotiations, and in fact, at that time, the tribe had already begun the process of selecting sites. It is probable that the tribe began scouting about for a partner shortly after they gained recognition in December, 2000.

And even though Chairman Sarris swore to your Committee that the tribe only wanted that one, small acre of land left from the original reservation, they now have an option on 380 acres of land that is protected in the County's General Plan as an Urban Growth Boundary. It is also an Agricultural Preserve, habitat to no fewer than four endangered species, vital vernal wetlands, a flood plain, and a State-designated groundwater recharge zone. The property is adjacent to an upscale mobile home park and modest rural homes, many of which stand to be lost to the road-widening necessary to accommodate the 15,000 to 20,000 additional cars per day that the casino would generate.

MTM

(152)

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

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VIA FAX

THIRTEEN PAGES TOTAL

OFFICE OF THE EXECUTIVE SECRETARIAT

October 16, 2003

Honorable Dale E. Kildee
2107 Rayburn House Office Building
Washington, DC 20515

re: Committee on resources Oversight Hearing, May 16, 2000, Serial Number 1060995

Dear Congressman Kildee:

On May 16, 2000, Greg Sarris spoke before the above-referenced committee on the matter of recognition for the newly formed Federated Indians of Graton Rancheria. His testimony was given in conjunction with Congressman Lynne Woolsey, whose bill was to give the tribe recognition. Mr. Sarris and his tribe made repeated promises to Congressman Woolsey that the Federated Indians would *not* seek a casino, which promises she repeated to your Committee in good faith. Chairman Sarris made these same promises to you and Mr. Gilchrest at the May 16th, 2000, hearing. In reality, the tribe was probably already considering a casino.

My proof for this is found in an article in the March 9-15, 2000, edition of *The Sonoma County Independent* (attached), in which Federated Indians Vice-Chairman Gene Buvelot spoke openly about the role of a casino in the tribe's future, stating that "gaming is not ruled out". Greg Sarris is quoted in the article as follows:

"Although the group has been approached by "countless" gaming and non-gaming business ventures, because the tribe is better located for a business interest than any other in the Bay Area, Sarris thought Woolsey would have pushed the bill through quickly because of its anti-gaming clause. She hasn't. Now, Sarris says, another bill being drafted by the federal Bureau of Indian Affairs and involving seven tribes, including the Federated Indians of Graton Rancheria, *would* allow local gaming.

"This won't please Woolsey's constituents, because they don't want a gambling casino in Petaluma or San Rafael," he says.

Sarris--who penned the critically acclaimed books *Grand Avenue* and *Watermelon Nights* and is something of a celebrity himself after his remembrance of growing up on Santa Rosa's Grand Avenue became an HBO mini-series--is "more than a little frustrated" by what he calls the slowness of Woolsey's office.

"Robert *Redford* returns my calls, and Woolsey's office doesn't," he gripes."

Two months after this interview was conducted, Chairman Sarris sat before you and Congressman

Thank you for your testimony.
Ms. WOOLSEY. Thank you, Mr. Chairman. Mr. Chairman, when you just said expand it later on, that is exactly why we want that language to stay in the bill for recognizing the sovereignty and what the tribe wants, and that is no gaming, no matter if they expand it or not, and that is important to the community, it is important to me, and it is important to them, and I would hope we could have a markup and keep the language intact as the bill is drafted now.
Mr. GILCHREST. We will work with you, Ms. Woolsey.
Ms. WOOLSEY. Thank you very much.
Mr. GILCHREST. Thank you very much.
Mr. SARRIS. Thank you.
Mr. GILCHREST. Yes, sir.

Our next panel will be the Honorable Kevin Gover, Assistant Secretary, Bureau of Indian

END OF FAX TRANSMISSION

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20240

IN REPLY REFER TO:

MEMORANDUM

To: Regional Director, Pacific Region

From: Office of Indian Gaming Management

Subject: Public Comments

Date: October 2, 2003

Enclosed are comments received from the public concerning matters currently under consideration by your regional office. They are forwarded to you for appropriate action.

Ione (Plymouth)
Jamul
Pala (Pechanga)
Temecula (Hesperia)

RECEIVED
BY AFM DATE 10/3/03

153

Fax Cover Sheet

To: Aurene M. Martin
Assistant Secretary- Indian Affairs
Fax#: (202) 208-5320
From: Amy Pamatmat -
Fax#: (707) 795-2919

RE: NO SUPPORT FOR 300+ ACRE CASINO AND HOTEL IN ROHNERT PARK CALIFORNIA.

PROJECT BEING PROPOSED BY: FEDERATED INDIANS OF GRATON RANCHERIA AND THE STATION OF CASINOS OF LAS VEGAS, NV

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Gail Norton
Secretary of the Interior
US Department of the Interior
1849 C Street Northwest.
MS-7229
Washington D.C. 20240

Re: **Rohnert Park, California Federated Indians of Graton Rancheria plan for 300+ acre casino and hotel-**

Dear Ms. Norton,

I am writing in **protest** to the 300+ acre casino project that is being proposed in Rohnert Park, CA. If the project goes through, it will be the largest casino near a residential population in the San Francisco Bay area. I live in an unincorporated area of our small community and it breaks my heart to know that I will have to move if this project goes through. I moved to this county for it country feel, good schools, and community involvement. I am a 'transplant" from Southern California. If I wanted to live near a crowded hotel and casino, I NEVER would have moved to an unincorporated farming community where my neighbors are vineyards and cows. **We already have a casino in our county!!!!** We don't need another. Please do not support the purchase of this land by the Federated Indians of Graton Rancheria and the Station of Casinos of Las Vegas, NV. Thank you for your time and consideration.

Sincerely,

Amy Pamatmat

Amy Pamatmat
1039 W. Sierra Ave.
Cotati, CA 94931
(707) 795-2918

1551

130

Stop the Casino 101 Coalition

Sonoma County, California
www.stopthecasino101.com

URGENT FAX

RECEIVED
SEP 30
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

DATE: September 25, 2003

TO: Honorable Aurene M. Martin, Ass't Secretary-Indian Affairs
Department of the Interior
Fax: 202-208-5320

FROM: Marilee Montgomery
Phone/Fax (please call before faxing): 707-588-9926

re: Propsed Rohnert PArk casino site

Page One of Two

Copy of 9/22/03) email from H.R. Downs, President of the O.W.L. (Open Space, Water Resource, Land Use) Foundation, Penngrove, CA., setting forth the potential problems the casino for Sonoma County water supplies and water rights re: Graton Rancheria casino:

"Yes, the casino, using the unique "super rights" of Native Americans, would have federal water rights. Establishing a federal water right on top of a proven groundwater overdraft area automatically creates a legally unstable atmosphere that would set the Graton Rancheria tribe and the City of Rohnert Park on an inevitable collision course. It would be only a matter of time before the casino wells either run dry or start pumping brackish water. When that happens the United States Attorney General would appear and engage in nasty litigation. In the end, most likely, what is left of the groundwater in the southern Santa Rosa plain would be adjudicated. The Indian tribe would get the lion's share, then (probably) the residents of Penngrove, then Cotati, then SSU. Rohnert Park residents would be last because they are the most recent arrivals. But no one, not even the Indians, will be pleased with adjudication; look south at the 14 districts that have suffered this lengthy, extremely expensive process and you can see than none of the participants are satisfied.

Wells nearby the proposed site are already experiencing difficulties. The purported plan, as reported in the press, for multiple 1,000 foot wells, represents a huge draw. The five (?) restaurants, 200-some-odd room hotel, gardens, wet bars, and other water-intensive facilities suggest water use of vast proportions. Most domestic wells range from 50 to 450 feet.

Not far from the proposed casino site is a very large well, the Todd Road "emergency" well operated by SCWA that has been pumping water 24 hours a day for the last three years (suggesting, incidentally, that we have been in an emergency for some time). This well alone pumps more water in a day than the entire, now famous, study area will recharge in a day. This famous study, conducted by PES Environmental, proved groundwater overdraft in Rohnert Park, Cotati, SSU and various surrounding unincorporated areas including Penngrove. The whole study area recharges at 1.6mgd and the Todd Road emergency pump (which is immediately adjacent to but conveniently

154

Aurene M. Martin
Assistant Secretary- Indian Affairs
US Department of the Interior
1849 C Street Northwest.
MS-414-MIB
Washington D.C. 20240

Re: **Rohnert Park, California Federated Indians of Graton Rancheria plan for 300+ acre casino and hotel-**

Dear Ms. Martin,

I am writing in **protest** to the 300+ acre casino project that is being proposed in Rohnert Park, CA. If the project goes through, it will be the largest casino near a residential population in the San Francisco Bay area. I live in an unincorporated area of our small community and it breaks my heart to know that I will have to move if this project goes through. I moved to this county for it country feel, good schools, and community involvement. I am a 'transplant" from Southern California. If I wanted to live near a crowded hotel and casino, I NEVER would have moved to an unincorporated farming community where my neighbors are vincyards and cows. **We already have a casino in our county!!!!** We don't need another. Please do not support the purchase of this land by the Federated Indians of Graton Rancheria and the Station of Casinos of Las Vegas, NV. Thank you for your time and consideration.

Sincerely,

Amy K. Pamatmat

Amy Pamatmat
1039 W. Sierra Ave.
Cotati, CA 94931
(707) 795-2918

located outside this study area) pumps 1.7mgd. Rohnert Park alone pumps 4.3mgd. If the casino is permitted to fire up multiple one-thousand foot wells inside this area we should expect nearby domestic wells to go dry or to gush degraded water, as has happened in a circle around the Todd Road pump.

If the casino, or any other large operation there, is given surface water instead, so that they needn't tax the overdraft, then we run into the very serious problem of the ongoing NOAA Fisheries study that promises to substantially reduce Eel River diversions. NOAA has already estimated in its biological opinion that those reductions could be 80%. Just like the groundwater, there is very little surface water left.

Either way, this casino proposal has little to do with gambling, Native American history, architectural appropriateness, or any other issue other than water.

Regards,
H.R. Down"

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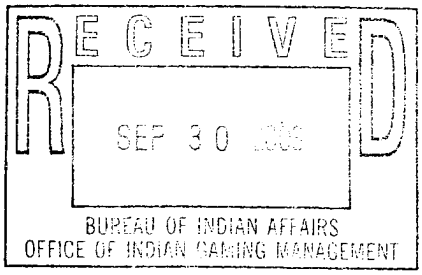

September 26, 2003

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of the Interior
Fax: 202-208-5320

Aurene:

I am writing in regard to the casino project currently being discussed in Rohnert Park California.

On behalf of myself, my husband and my three daughters who live in the area proposed for this casino, I am asking for your help in stopping this project. My family lives in the country and moved here for a chance to raise our girls in a healthy, happy environment. We want swingsets not slot machines in our backyard.

The traffic on the frontage road is unbelievable and should this casino be built it will be a living nightmare. My family will be subjected to increased crime, increased traffic, a major decrease in water quality, the environmental impact on the land surrounding my home will be unbearable and unhealthy for my family. My heart breaks thinking that I have done everything in my power to give my girls a wonderful childhood and now it can all be taken away without any concern for the citizens directly affected.

Knowing that people can drink 24 hours a day and then get into a car and drive down my street is every parents biggest fear – how can I keep my girls safe in this environment. The local officials here in Rohnert Park don't seem to care - We are asking you as parents and very concerned citizens to help us stop this project – our children are our future and we need to protect them with everything we have.

Many Thanks
Jube & Sally Begley

Jube & Sally Begley
815 Scenic Ave
Santa Rosa, CA 95407
707-585-0538

202 208 5320

157) 130

BETTY ANNE GOULD

704 Brett Avenue • Rohnert Park, CA 94928 • (707) 792-1573

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 25, 2003

Ms. Aurene M. Martin
Deputy Assistant Secretary of Indian Affairs
U.S. Department of the Interior
1849 C Street NW MS4140MIB
Washington, DC 20240

Dear Ms. Martin:

This letter is written to voice my strong opposition to the Graton Rancheria Indian tribe acquiring property in the city of Rohnert Park for the purpose of building a casino and hotel complex.

This deal is not supported by the residents of Rohnert Park. Rohnert Park is a family-oriented community and its design, amenities, and neighborhoods reflect this.

The thought of a casino in this residential community is outrageous. Please take action to stop the advancement of this plan immediately.

Sincerely,

Betty Anne Gould

SWM

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Suni Warcloud Montgomery
1521 Sarkesian Drive ~ Petaluma, California 94954-4408

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

norable Aurene M. Martin, Ass't. Secretary - Indian Affairs
ited States Department of the Interior
49 "C" Street, NW
ashington, DC 20240

Federated Indians of Graton Rancheria Rohnert Park, CA casino site

ar Assistant Secretary Martin:

m writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by Federated Indians of the Graton Rancheria, and to express my support for HR2656. The Federated lians of Graton Rancheria plan to use the site for a huge, Las Vegas-style casino. This is not a servation"; it is a commercial development which would never be allowed to be built in this nmunity on this land under any other circumstances. The tribe has so much money behind it from s Vegas developers (Station Casinos) and local developers (Kenwood Investments), and our state vernment officials receive so much money from Indian gaming that people like me have nowhere to to stop a project like this.

e proposed casino site is an Agricultural Preserve area and important Vernal Wetlands. It is habitat endangered California species and provides food and nesting areas for migrating waterbirds in the ring. It is a flood plain and drainage system for the County. It is also a groundwater recharge area signated by the State of California.

e have all just learned in yesterday's paper that Sonoma County's water supply is bankrupt, and that re is *no* additional water for new projects. The Tribe plans to sink multiple1,000 to 2,000 foot lls, but the aquifer in this area is already in a negative recharge situation. This casino will pump llions of gallons of water each day, and could dry up private wells that are the only water supply for arby homes.

e have had serious traffic problems on Highway 101 for decades, and this project is supposed to ng 20,000 additional cars each day, twenty-four hours a day. Highway 101 can't take that additional ffic, nor can the surface streets.

hnert Park is also a college town, and I don't believe that a casino is an appropriate business to have a town with so many young people in it. Casinos do attract crime and drugs wherever they are ated. A casino would forever change this whole area for the worse.

s Vegas gambling interests are cynically abusing the Federal land trust system, put into place to help tive Americans secure property for homes, and they will profit directly from this misuse of the deral trust system. We can't fight Las Vegas money by ourselves. Please - help us keep this project t of our city.

ncerely,

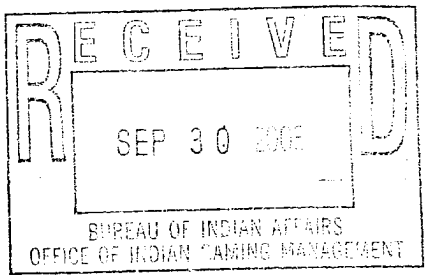
ni Warcloud Montgomery

eter Z Jackson

152 Wilfred Avenue
Santa Rosa, California 95407

159

eptember 28, 2003



onorable Aurenen M. Martin, Ass't. Secretary-Indian Affairs
nited States Department of the Interior
49 "C" Street, NW
ashington, DC 20240

: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

ear Assistant Secretary Martin:

m writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed the Federated Indians of the Graton Rancheria, and to express my support for the legislation oposed by Lynne Woolsey and Dianne Feinstein. The Federated Indians of Graton Rancheria n't want a place to build their homes and raise their families. They want to cash in by using e federal land into trust system to build a huge casino on land that Sonoma County voters have signated as Agricultural Preserve. Nobody would be allowed to build this kind of project here, d I don't think that this tribe should be allowed to build it, either.

e members of this tribe are *not* a disenfranchised, downtrodden group living in shanty houses; ey are everyday citizens who have been working and living in the community at large for nerations. But thanks to the raptors from Las Vegas, the tribe has so much money behind it m Station Casinos that stopping this project is like trying to stop a juggernaut; we're just tting rolled over and flattened. Our state government officials from Gray Davis to Joe Nation ceive so much money from Indian gaming that I, a life-long Democrat, am voting in the recall ection for Arnold Schwarzenegger, who promises to stop this abuse.

y house would be only 100 yards from this casino, and most casinos in California have proved be bad neighbors. I've lived here for twenty-five years, and planned to stay here until I died, t in all probability, I would have to sell my house to escape the noise, traffic, and crime that uld invade our peaceful rural neighborhood if this casino is built.

e all voted, tribal members included, for a County General Plan that saved this whole area for riculture. What is the point of community planning if the federal government allows instant bes to go reservation shopping in order to build these giant casinos with all their attendant oblems? Las Vegas has found a bonanza in this situation, and is exploiting the federal process r their own profit, at the expense of the communities in which these casinos are built.

e have serious water problems here, and I don't want to risk losing my well or losing our water ghts to the tribe. We have bad traffic problems, and I don't think the tribe has enough money or ll give any money - since typically, they haven't - to mitigate the traffic impact.

ease, do not allow this Rohnert Park site to be taken into trust. Don't let Las Vegas into our me town.

ncerely, Peter Z Jackson

ter Z. Jackson

Copy of 9/22/03) email from H.R. Downs, President of the O.W.L. (Open Space, Water Resource, Land Use) Foundation, Penngrove, CA., setting forth the potential problems the casino for Sonoma County water supplies and water rights

Yes, the casino, using the unique "super rights" of Native Americans, would have federal

Sent by:Marilee Taylor Montgomery
rilee Taylor Montgomery
152 Wilfred Avenue, Santa Rosa, CA 95407

orable Aurene M. Martin, Ass't. Secretary-Indian Affairs
ed States Department of the Interior
"C" Street, NW
hington, DC 20240

RECEIVED
SEP 30 2002
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Federated Indians of Graton Rancheria Rohnert Park, CA casino site

r Assistant Secretary Martin:

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en the Federated Indians of Graton Rancheria petitioned the Federal government for tribal status, they promised that they would not to build a casino. Now, having lied to the government of the United States, they are asking you to declare their casino site a ervation". This cynical abuse of a system put into place to help Native Americans secure property for homes is being bankrolled by ion Casinos Inc., a Las Vegas casino development consortium, which will profit directly from this misuse of the federal trust em.

proposed casino site is designated in the Sonoma County General Plan as an Agricultural Preserve area, and is also Vernal tlands. It is adjacent to modest homes and dairy farms, and on the southern side, is immediately adjacent to a Senior Citizens' bile Home Park. These Vernal Wetlands are habitat to endangered California species and are an important resource for migrating er fowl each Spring. As a flood plain and drainage system for hundreds of square miles of the County, these Wetlands are an ortant flood control asset. They are a vital water replenishment system for the Santa Rosa Plain Aquifer, which is already seriously leted.

ause there is no additional water capacity within the Sonoma County Water Agency, the Tribe plans to sink multiple1,000 to 2,000 t wells for this project. The City of Rohnert Park was successfully sued in 1999 for pumping too much groundwater from City ls, causing the surrounding area's private wells to run dry. This casino will need millions of gallons of water per day. Recycling d water for irrigation or toilets will not soften the impact on the aquifer; eventually the wells will suck outward, thus, affecting vate wells that are the only water supply for nearby homes.

sewage capacity of the Santa Rosa sub-regional system is already undersized . Much of the capacity for the growth of the county cities that is dependent on our sub-regional system could be used up by this single project, leaving none for the current or future ds of the community at large.

impact of the proposed casino on the social, economic and natural resources of this area is beyond definition. The Highway 101 ridor, already in serious trouble, is not equipped to handle the traffic that this project would generate, nor are the two-lane rural ds flanked by homes that would be the points of entry to the casino. Families, including my own, would be displaced from their nes by the road-widening that would be necessary for the project.

s time for the Federal government to put a stop to the abuse of the federal land trust system, and prevent Las Vegas interests from ther exploiting the process. Further, this site is inappropriate for commercial development in general and for a large casino in ticular.

ase - withhold reservation status for this site!

ry truly yours,

M. Taylor Montgomery

rilee Taylor Montgomery

160)

SWM

Suni Warcloud Montgomery
1521 Sarkesian Drive ~ Petaluma, California 94954-4408

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

onorable Aurene M. Martin, Ass't. Secretary - Indian Affairs
nited States Department of the Interior
49 "C" Street, NW
ashington, DC 20240

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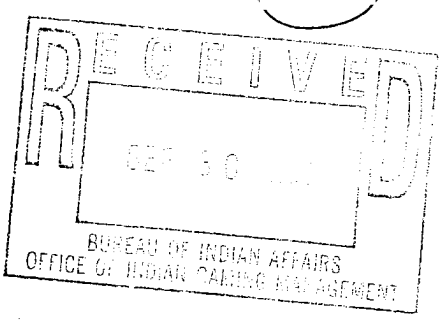
icerely,

ni Warcloud Montgomery

1320

(161)



225 Fig Court
Rohnert Park, Ca. 94928
September 13, 2003

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C., 20240
Fax 202-208-5320

I am writing to oppose the casino complex that the Federated Indians Of Graton Rancheria are planning to build on designated land just outside the city of Rohnert Park, Ca.

Rohnert Park is a small community of approximately 40,000 people. It is primarily a family community with many parks, swimming pools, and green space. Most of the families living here commute to jobs in larger communities on already overcrowded Hwy. 101. The additional traffic this complex would bring to an already difficult traffic situation is estimated to be around 87%, according to figures from Cache Creek Casino in Yolo county.

Additionally, the very flavor of our city, labeled "The Friendly City" would change drastically. US News and World Report cites that crime in casino cities is roughly 84% higher than the national average.

At a local meeting the Federated Indians of Graton Rancheria informed us that the average earnings for employees at this casino would be $20,000. In a city where the average home costs $300,000, it would be impossible for these employees to find homes or places to rent. Where would they live or how would they supplement their income?

Water is an additional concern for our city. Rohnert Park's water supple comes from three large wells for the entire city. At present our water table is already dropping and we have had to alter our water use. Allowing a large casino complex to tap into this water table, without any controls on them, would create a hardship for the whole city.

These are only a few of the issues that cause me to request that you NOT grant the trust for the casino to the Federated Indians of Graton Rancheria.

Sincerely,

Beverly A. LaBone

Beverly A. LaBone

(162)

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) Andrea Carter

I live at 5465 Petaluma Hill Rd Santa Rosa

My telephone # is 707-577-0663

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 9/10/03

163

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) Maria Chavez

I live at 2133 Quintin Pl. Santa Rosa Ca. 95407

My telephone # is (707) 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Maria Chavez Date 9/09/03

164

My name is (Print) Yesenia Chavez

I live at 2133 Quintin place santa Rosa Ca. 95407

My telephone # is (707) 526-7046

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Sincerely,

Signature Yesenia Chavez Date

RECEIVED
SEP 30
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESOURCES MANAGEMENT

(165)

My name is (Print) Vicki Jackson

I live at Knolls in Santa Rosa

My telephone # is 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Vicki V. Jackson Date 9-10-03

RECEIVED

My name is (Print) Suzanne Dodd

I live at 1915 Gardenview Circle, Santa Rosa 95405

My telephone # is unlisted

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Suzanne Dodd Date 9-8-03

RECEIVED

(167)

My name is (Print) WILLIAM E. CONANT

I live at 1294 BLOOMFIELD RD, SEBASTOPOL

My telephone # is 829-5388

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature William E Conant Date 9/9/03

RECEIVED

168

My name is (Print) VICTOR BRAIN

I live at 2036 ALEXIS CA SANTA ROSA, CA 95405

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Victor Brain Date 9-11-03

RECEIVED SEP 10

169

My name is (Print) CHRISTEFER BRAIN

I live at 2036 ALEXIS CT. SANTA ROSA, CA 95405

My telephone # is

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Sincerely,

Signature Christefer Brain Date 9-11-03

RECEIVED

170

My name is (Print) Natalie Oropeza

I live at 200 Willowgreen Place Santa Rosa CA 95403

My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Natalie Oropeza Date 9-11-03

RECEIVED

171

My name is (Print) Tiffany Oropeza

I live at 200 Willowgreen Place Santa Rosa CA 95403

My telephone # is 707 523-1333

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Sincerely,

Signature Tiffany Oropeza Date 9-11-23

172

My name is (Print) KATHERINE BRAIN

I live at 4749 HARROW CT. SANTA ROSA CA 95405

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Katherine Brain Date 9-11-03

(173)

My name is (Print) NATALIE CRAIG

I live at 524 OLD REDWOOD HWY #E Santa Rosa

My telephone # is 707-579-7724

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 9/8/03

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

174

My name is (Print) Robert Orozco

I live at 200 Willow Green Place Santa Rosa CA

My telephone # is 707 542-6200

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Robert Orozco Date 9/8/03

RECEIVED

175

My name is (Print) SANDRA CONANT

I live at 1294 BLOOMFIELD RD. SEBASTOPOL, CA

My telephone # is 707 829-5388

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Sincerely,

Signature Sandra Conant Date 9-8-03

RECEIVED
BUREAU OF INDIAN AFFAIRS

176

My name is (Print) Josephine Oropeza

I live at 200 willowgreen Place Santa Rosa CA

My telephone # is 707 523-1333

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Josephine Oropeza Date 9/8/03

RECEIVED

177

My name is (Print) ADAN CHAVEZ

I live at 2133 QUINTIN PL. SANTA ROSA CA 95407

My telephone # is 707 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature adan chavez Date 9/08/03

RECEIVED

178

My name Robert O'Dell

I live at 4471 Labath Ave, Santa Rosa, CA 95407

My telepho 707 585 2632

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Sincerely,

Signature Robert O'Dell Date 9-7-03

RECEIVED

179

My name is (Print) Jennifer Burton

I live at 9001 conde LN #2 windsor CA 95492

My telephone # is (707) 620-1055

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jennifer Burton Date 9-6-03

RECEIVED

180

My name is (Print) Alberto Yanez Sr.

I live at 766 Brittain Santa Rosa CA 95403

My telephone # is 526-4309

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Alberto Yanez Sr Date 9-6-03

181

My name is (Print) Jessica Burton

I live at 766 Brittain Ln. Santa Rosa CA, 95403

My telephone # is 526-4309

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Sincerely,

Signature Jessica Burton Date 9-6-03

182

My name is (Print) Tim Blocker

I live at 4485 LABATH Santa Rosa Cal 95403

My telephone # is 588 8620

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Timothy J Blocker Date 9-6-03

RECEIVED

183

My name is (Print) Sherri Blocker

I live at 4485 Labath Ave Santa Rosa, CA

My telephone # is 707-588-8620

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Sherri Blocker Date 8-5-03

RECEIVED

184

Peggy Mattis
1509 Genesis Court
Rohnert Park, CA 94928

September 11, 2003

Aurene M. Martin
Deputy Assistant Secretary-Indian Affairs
US Department of Interior
1849 C Northwest MS-4140-MIB
Washington, DC 20240

Dear Ms. Martin,

There is currently a battle going on in my community against the Federated Indians of the Graton Rancheria regarding the proposed casino to be built on the western edge of my city, Rohnert Park, California. We do not want the casino in our neighborhood. The nickname for my community is the friendly city and it is very family orientated. Our streets cannot handle the traffic and the negative aspects that come with gambling, which I thought was illegal in my state. Gambling is addictive and ruins lives. Also, the land is inhabited by the tiger salamander, which is currently a protected species. How is it that retail stores cannot overcome the tiger salamander issue and the Indian tribes can??
I realize Proposition 1A gave the Indians the right to purchase land, have it placed into protected status by the federal government and then follow their own government on that land. I personally did not vote for Prop 1A and it is getting out of control. There are currently five proposed casinos in the Northern California area.
Please do not grant the proposed site into protected trust! This location is not appropriate due to the close proximity to town and the current traffic congestion. All other casino locations have been miles out of any town. Signatures are being gathered and the battle goes on. Intent to recall the Rohnert Park City Council is now in progress since they are negotiating with the tribe against their citizen's wishes.
I appreciate your attention to this matter. We do not want the land to be put into trust!

Thank you,

Peggy Mattis

RECEIVED

191

FACSIMILE TRANSMISSION SHEET

To: Aurene Martin From: Janet Ruiz

Company: US Dept of Interior Date: 9/10/03

Fax Number: # of pages including cover: 2

Phone Number: Sender's Reference Number: (707)584-3430

CC: President Bush, Vice President Cheney, Secretary Gail Norton

Re: Your Reference Number:

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Thank you for considering our situation!

Janet Ruiz
concerned citizen

RECEIVED

185

September 10, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department of the Interior
1849 C Street Northwest
Washington D.C.

Dear Ms Martin,

Please consider our request to withhold the granting of a Trust to the Federated Indians of Graton Ranchereia in Sonoma County, California. They are asking for land in Rohnert Park, CA to build a casino.

The people of Rohnert Park are opposed to the building of a casino on this property for the following reasons:

1. There is not enough water to sustain this large complex that they are proposing. Geological studies have shown that the water table is rapidly dropping due to over consumption that is occurring today. Water is being pumped out at roughly 2.5 times the rate it is being replaced by natural means. (Rohnert Park Environmental Impact Report SCH No. 99062114).

2. A Traffic study has not been done. Highway 101 is overcrowded all day and on weekends already and could not handle increased traffic to the casino. Station Casinos does not have concrete plans to widen the road, only promises to help. The traffic outside Cache Creek casino in Yolo County has increased by 87%. (Time Magazine, Dec 23, 2002 Caltrans study).

3. The Police and Firefighters are opposed to it because they do not have the resources to support the needs that this large complex will create. This is a small town of 42,000 which was developed as a bedroom community to Santa Rosa and does not have the capacity, workforce, etc to support a casino and resort.

Thank you for considering these issues as you make your decision.

Sincerely,

Janet Ruiz

Janet Ruiz
1563 Gary Court
Rohnert Park, CA 94928

Cc: President Bush, Vice President Cheney, and Secretary of the Interior Gail Norton

RECEIVED
STATE OF CALIFORNIA
OFFICE OF INDIAN AFFAIRS

Sept 10, 2003

Dear Aurene M. Martin,

I am writing in opposition to a proposed casino on a site just outside Rohnert Park, California. I am urging you not to grant a Trust to the Federated Indians of Graton Rancheria.

I think Native Americans deserve all the breaks we can give them but the proposed site is not a good one for a Casino. The site which is currently used for livestock is a buffer zone between two growing cities. The strain on our roads and water supply would be great. I think our quality of life would be changed for the worse. Rohnert Park was designed for families. Every home is within walking distance to at least one playground and elementary school. A casino would definitely change the atmosphere and potentially bring crime to our family friendly city.

Thank you for your consideration.

Gale F Davis

Gale F. Davis
8508 Lombard Way
Rohnert Park CA 94928

130

187

September 3, 2003

Aurene M. Martin
Deputy Assistant Secretary of Indian Affairs
U.S. Department of Interior
1849 C Northwest MS-4140-MIB
Washington, DC 20240

Dear Aurene M. Martin:

I am a resident of Rohnert Park, CA where Station Casinos and The Graton Federation Rancheria are proposing to build a Casino. This Casino is being built in a wetland area less than a half a mile from schools, movie theaters and local shopping. Myself and other residents in Rohnert Park are adamantly opposed to this Casino.

I don't believe a thorough study by Station Casinos and The Graton Federation Rancheria has been done on environmental issues, water issues, and our infrastructure. If this Casino is built it will put a tremendous strain on our resources.

In the past few years building permits have been denied in our area because our water table is depleting. The same officials that do not allow affordable homes to be built in our area; are saying yes to the Casino. The proposed site of this Casino is directly over the sensitive ground water table.

Our City Council has entered into a preliminary agreement to allow this Casino to be built. The residents of Rohnert Park have spoken to the City Council and have stated their concerns. We have organized and are well on our way to 10,000 signatures saying **NO TO THE CASINO**. And Yes to our Water.

We would appreciate if your office could assign someone to look into this matter before it is too late and our city becomes a ghost town.

Sincerely,

Rosemary Mojica
PO Box 1455
Rohnert Park, CA 94928

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF ASSIST. SECRETARY

130

188

My name is (Print) Mike Periclakes

I live at 4968 Snark Ave, SR 95409-3562

My telephone # is (707) 539-8632

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

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Sincerely,

Signature _____ Date 9/21/03

189

My name is (Print) Linda Periclakes

I live at 4968 Snark Ave

My telephone # is 707) 539-8632

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Sincerely,

Signature Linda Periclakes Date 9/21/02

190

My name is (Print) Ty Visscher

I live at 6333 Sonoma Hwy SR CA 95409

My telephone # is 707 538-2604

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Ty Visscher Date 9/23/03

191

My name is (Print) Laura Colgate

I live at 6333 Sonoma Hwy Santa Rosa CA 95409

My telephone # is 707-538-2604

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Sincerely,

Signature Laura Colgate Date 9/22/03

192

My name is (Print) Chandell Beeson

I live at 122 Hill Blvd Petaluma 94952

My telephone # is (707) 765-0621

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Chandell Beeson Date Sep 8, 03

RECEIVED
SEP 26 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

193

My name is (Print) Laisha J. Beeson

I live at 120 Hill Blvd. Petaluma, Ca 94952

My telephone # is 707-762-1902

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Laisha J. Beeson Date 9/8/03

RECEIVED
SEP 26 2003

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20240

IN REPLY REFER TO:

to NR

MEMORANDUM

To: Regional Director, Pacific Region

From: Office of Indian Gaming Management

Subject: Public Comments

Date: October 2, 2003

Enclosed are comments received from the public concerning matters currently under consideration by your regional office. They are forwarded to you for appropriate action.

Dutton (Robert)
Jimbrito (Hesperia)

RECEIVED
RPM 10/8/03

194

My name is (Print) DEBORAH UDALL

I live at 1355 Manhattan Way

My telephone # is 707-575-8102

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Deborah Udall Date 9/12/03

RECEIVED
SEP 26 2003
OFFICE OF FEDERAL ACKNOWLEDGMENT

195

My name is (Print) John Beeson

I live at 122 Hill Blvd, Petaluma, CA 94952

My telephone # is 707-762-1902

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature John Beeson Date 9-8-03

RECEIVED
SEP 26 2003

196)

My name is (Print) JIM DREAVER

I live at 553 Nadee St Sebastopol CA 95472

My telephone # is 707 823 1640

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature [signature] Date 9-14-03

RECEIVED
SEP 26 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN

197

My name is (Print) Anne Julene Beeson

I live at 122 Hill Blvd Petaluma CA 94952

My telephone # is (707) 765-0621

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature A. Julene Beeson Date 9-8-03

RECEIVED SEP 2 6 2003 OFFICE OF

198

September 25, 2003

Aurene M. Martin
Assistant Secretary - Indian Affairs
US Dept of the Interior
1849 C Street Northwest
MS-414--MIB
Washington D.C., 20240

RE: Graton Rancheria's Proposed Casino

I am a resident next to the property that the Graton Rancheria wants to purchase for a casino. This casino will be huge; along with the gaming area, there will be a 300-room hotel, 1500-2000 seat special events auditorium, a spa and restaurants.

I have serious concerns about this project and I'm truly hoping the Dept. of the Interior listens to what the people who will be impacted by this have to say.

The area they want is prime agricultural land and is supposed to be a greenbelt area. The Laguna De Santa Rosa waterway (which is an environmentally sensitive area) runs through the property. These fields and waterway are home to so many animals; foxes, pheasants, quail, herons, egrets, ducks, geese, and migratory birds to name a few. Not to mention the endangered Tiger Salamander. This area is also our water recharge area and should be left natural, not paved over!

The property is bordered by rural residential neighborhoods. This casino will be right in the midst of our neighborhood and will take away the reason we live out here! It is predicted that there will be several thousand people coming to this casino a day! The traffic will be horrible! The very lightly traveled road that I live on will undoubtedly become busy as one of the entrances/exits of this casino will come out onto my road. How many drunks are going to decide to take a ride in the country before heading home?

The City of Rohnert Park is not providing the Rancheria with water or sewer. This is a major concern to me as water is already at a premium here. The City of Rohnert Park is also on a well and pumps so much water it has lowered our water table. The Rancheria is planning on drilling wells at least 1,000 feet deep that can pump 2700-3500 gallons a minute. We are all on shallow wells in this area and I am very worried that we will go dry. Who will help us? Will the Rancheria? No. We'll have to find a way to come up with the thousand of dollars it costs to have a new well dug. While the cause of our dry wells will be raking in millions of dollars.

I have lived out in this area for 13 years and have always felt safe. The only crime out here is once in awhile someone's pig gets stolen. Now I'll be wondering when I'm gone if my home is safe from burglars. Statistics have shown us that crime increases in areas that have casinos!

This is Las Vegas gambling (Station Casinos) using the tribe's name in order to make a profit. Our local politicians won't listen to the thousands of Rohnert Park residents and unincorporated residents who are very upset and against this. They only see the millions and millions of dollars that Station Casino is promising them. They don't seem to care about the impact of this project on the area. Please don't let Las Vegas and all the trouble it brings into our neighborhood. Is it so discouraging to see how lots of money can buy anything.

Please take into consideration the average folks who live out here, working hard so we can improve our homes and lives. Our quiet rural living is going to be gone if this huge casino goes in. Please ask yourself this; Would you want a casino down the road from your house? I can't imagine you would. Please don't let it happen out here. Please don't grant a Trust to the Federated Indians of the Graton Rancheria for this project.

Respectfully submitted,

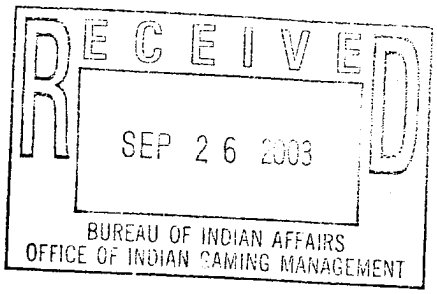
Lisa Waite

Lisa Waite
4327 Primrose Avenue
Santa Rosa, CA 95407
707-585-1870
email: lwranch@pcweb.net

RECEIVED
SEP 26 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

130

September 25, 2003



Gail Norton
Secretary of The Interior
1849 C Street Northwest
MS 7229
Washington D. C., 20240

Fax: (202) 208-6956

1997

Dear Ms. Norton,

I am writing to you in hopes that someone will listen to the wants of the people of Rohnert Park, California. Our elected City Council doesn't seem to care what the people of their city want. The City of Rohnert Park has approximately 40,000 people and is a family community. We pride ourselves on being a "Friendly City" and a nice place to raise children. We have a park in every neighborhood. Our neighboring town Cotati, is a college town. We have worked hard to make these two towns a nice place to live. Now the Indians are proposing to buy land in our small community to build a casino. The people of the town have many concerns and our city council is not listening.

A few concerns are sewage and water. We do not have the water or sewage capacity for such a complex. Also this is a farming community with small family business that have been in the area for a long time. It would be a crime to see these businesses run out of their hometown.

At a time when the State and some local governments are running a deficit we can not afford to build a complex where the individual city is responsible to provide police and fire protection. It is reported that crime increases in cities that have casinos. These casinos do not pay any local or state taxes. This would be a drain on the finances of a city that is already in a deficit.

I do not wish this on any city and I think the time has come to review the Sovereign Nation legislation. We can not keep giving things away and not expect anything in return. These casinos are not required to abide by any state or local regulations and this puts a big drain on the communities they reside. Something has got to change.

Sincerely,

Carrie Hill

Carrie Hill
52 Francis Cir.
Rohnert Park, CA 94928

pc: Aurene M. Martin, Asst. Secretary-Indian Affairs (202) 208-5320

RECEIVED
SEP 26 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

9/25/03

Aurene M. Martin
Assistant Secretary- Indian Affairs
U. S. Department of the Interior

Re: Proposed casino near Rohnert Park, California

Dear Aurene Martin,

I am writing in regards to the proposed casino near Rohnert Park, California I live one block away from the site, in southwest Santa Rosa. I have lived in this residential neighborhood for 20 years. While I am **not** against Indian casinos, I am extremely concerned about the proposed location for this project planned by the Federated Indians of Graton Rancheria. While the media and our local politicians refer to this piece of property as simply "land in an unincorporated" section of the county, the people who live on or near it will tell you a different story.

This piece of property (approximately 360 acres), is a designated community separator, a flood plain, vernal pool area, flood control channel, aquifer recharge area, a residential neighborhood, and home to several different species of plants and animals, some endangered (California Tiger Salamander, San Francisco Garter Snake, Sebastopol Meadowfoam, etc.), to name a few. The immediate surrounding residential neighborhood is comprised of hundreds of people who have all lived out here for years.

Other than the usual issues I have about a casino being located in the middle of a residential neighborhood (existing inability to support additional traffic, crime, noise, etc.), as well as the fact that the proposed casino entrance empties out directly onto my small, one lane street, I have some very serious concerns that I will outline as follows: This 360 acre property is located directly over our main aquifer "recharge" area. This aquifer serves residential water wells in Santa Rosa, Cotati, Penngrove, Rohnert Park, and some parts of Sebastopol. The property also has a large flood control channel running through it. This recharge area is vital to the thousands of people who depend on well water. Currently, we are in serious "overdraft" of our water supplies due to the amount of water that is being drawn from the aquifer by the city of Rohnert Park. Should this land be developed (i.e. paved or built on), the rain water will not be able to penetrate through to replenish the aquifer, and our wells will go dry. We have no recourse should this happen. Most people don't have an extra $15,000.00 to drill a new well. Additionally, this casino has plans to drill two 1,000 foot wells to provide water to the casino, restaurant, hotel, etc. This will further deplete the already endangered water supply.

Secondly, during the rainy season, this land, and the surrounding areas, are prone to extensive flooding. Main roads, residential properties, and fields are completely under water. On a good rainy day, the flood control channel overflows it's banks in a matter of hours. Should this 360 acres be built on, where will the water go? It has no place to go but our homes. The consequences could be catastrophic. These issues are not being addressed in the media, or by our local governments. We live out here year round, we know what happens. I **implore** you, please help us find a better place for this casino (or any proposed development on this property for that matter).

The Federated Indians of Graton Rancheria have purchased 2,000 acres of land near Sears Point, California. Initially, this is where they wanted to build their project. We feel that this 2,000 acre parcel would be a much more appropriate area for such a development. It's right off the freeway (easy access, no roads to deal with), it's centrally located, it's not in the middle of a residential neighborhood, they could actually build tribal housing as well as a casino, and if there are environmental issues to mitigate, it would be far easier to do this on a 2,000 acre parcel than on 360 acres. The Sears Point site just makes more sense.

I know this project is probably one of thousands you need to consider, and I know it's difficult, if not impossible, to make everyone happy. I'm not trying to shut down the Federated Indians of Graton Rancheria, I'm trying to help save my neighborhood. Please help us.

Thank you for your time,

Pamela A. Miller
4306 Primrose Ave.
Santa Rosa, CA 95407

9/20/03

RECEIVED
OCT 1 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Attn:
Aurene M. Martin

I strongly disapprove of the casino planned for the city of Rohnert Park, CA.

Thank you.

Siobhain Bradford
Concerned Resident

RECEIVED
2003 SEP 29 P 4:58
EXECUTIVE SECRETARIAT

Siobhain Bradford
7258 Alma Ave
Rohnert Park, CA
94928

RECEIVED
03 OCT 21 AM 9:23
OFFICE OF THE
EXECUTIVE SECRETARIAT

1577 Parkway Drive
Rohnert Park, CA 94928
October 14, 2003

69539

Gale A. Norton, Secretary of the Interior
United States Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Norton:

Are you aware that the vast majority of the 40,000 citizens in Rohnert Park, California oppose the casino/hotel/resort proposed by Station Casinos and their business partners, the Federated Indians of Graton Rancheria? I oppose it also. It's not proposed for a remote, outlying piece of land, but one adjacent to the city. The casino would be in the *backyard* of a family neighborhood of over 2000 residents!

The casino would cause problems that could not be mitigated by any amount of money, including:

- Dramatically increased traffic flow in an area that is already congested and poorly designed
- Water shortage—paving over a major recharging area for the Rohnert Park and Santa Rosa water table when we are already in a water-shortage crisis.
- Destruction of a habitat for hundreds of species of animals including white egrets, loons, grey fox, hawks, at least five species of owls, tiger salamanders, and badgers
- Decreased property values
- Gambling addiction and increased crime
- Increased DUI and resulting deaths and injury
- Economic threat to local cultural centers—Spreckles Performing Arts Center and The Luther Burbank Center for the Performing Arts.

Please, do not allow this land to be taken into trust for the Federated Indians of Graton Rancheria.

Sincerely,

Elizabeth A. Blevins

Elizabeth A. Blevins

4222 Primrose Avenue
Santa Rosa, CA 95407

Telephone: (707) 586-5913
mervisr@aol.com

03 SEP 10 PM 1:29

203

September 6, 2003

City of Rohnert Park
6750 Commerce Boulevard
Rohnert Park, CA 95407

Dear City Council:

I am a neighbor of the proposed casino and had signed a petition against it when it was first announced. I did so in the hope that the people planning the casino would work with the neighbors to assure that its negative impact on our small farm lifestyle would not be compromised. My partner asks that I let you know he has always been in favor of the development.

My two main concerns were the wells in the area and the design of the facility itself. Now that I have read about the intent to drill to the lower aquifer, which my engineer son-in-law tells me is a viable plan if properly designed; and have heard that the design is a very classy hotel casino (which I'd like to see, but was unable to stay at the Council meeting the night it was presented), I withdraw my objection to the development. In fact, I would like to compliment the tribe for its foresight in considering these issues.

I believe that development in this particular area is going to happen regardless of what the neighbors prefer. Although a casino wouldn't be my first choice for a neighbor, it wouldn't be my last either. I am very hopeful – and am asking you by writing this letter – that the traffic issues will be handled in such a way that Primrose doesn't become a thoroughfare. It is really important to us that our pets and relative quiet be preserved.

Aside from that, I for one welcome the Federated Indians of Graton Rancheria into our community and look forward to joining them for 99 cent breakfasts!

Sincerely,

Mervis Reissig

Mervis Reissig

Ron Pruitt

Ron Pruitt

cc: Federated Indians of Graton Rancheria
Congresswoman Lynn Woolsey
Congressman Mike Thompson
U.S. Senator Dianne Feinstein
U.S. Senator Barbara Boxer
Honorable Gail Norton
Bureau of Indian Affairs
Honorable George T. Skibine
Supervisor Mike Reilly

RECEIVED BY RPM 9-11-03

August 21, 2003

204

Senator Diane Feinstein
331 Hart Senate Office Building
Washington, DC 20510

Dear Senator Feinstein;

I would like to go on record as being strongly opposed to any Indian casino being built and operated on the western boundaries of Rohnert Park, California. This is apparently what is being proposed by the Graton Rancheria tribe of Northern California. The original plan was to build their casino on the outskirts of Petaluma, California; a neighboring town to Rohnert Park. But this plan met with such opposition, that the tribe turned its sights to Rohnert Park.

Ms. Feinstein, have you ever been to Rohnert Park? It's a small town wedged between Petaluma and Santa Rosa. We've suffered budget problems in both civic and educational areas due to blunders made by local government. I sincerely hope that the leaders of our little town don't see a casino as a way out of the red!!

My husband and I have been raising our kids in Rohnert Park since 1992. We've seen many "ups" as well as the "downs" that a town can go through. A casino is just not the right fit for our small town. I can't imagine our small police department (which already has a slow response time) trying to handle the heavy duties that are associated with a gambling establishment. In a nutshell, tell the Graton tribe to try another site…this one's not for sale!

Sincerely,
Pamela Desmond
1320 Rosie Court
Rohnert Park, CA 94928

CC: Congressman Lynn Woolsey
Secretary Gale Norton, Department of the Interior
Mayor Armando Flores

EXECUTIVE SECRETARIAT
OFFICE OF THE
03 SEP -3 AM 8:16
RECEIVED

592390

RECEIVED
RJM DATE 9/5/03

1300 Milton Place
Rohnert Park, CA 94928

592435

RECEIVED
03 SEP -3 AM 8:34
OFFICE OF THE
EXECUTIVE SECRETARIAT

205

Senator Feinstein
One Post Street
Suite 2450
San Francisco, CA 94104

Dear Senator Feinstein,

I am extremely concerned with recent plans to build a new casino in the city of Rohnert Park, CA. I am certain that the majority of Rohnert Park residents are opposed to the construction of this casino.

It has come to my attention that you have authored Senate bill 1342, which will require environmental studies before tribes can purchase land for this use. I am hopeful that this bill will be acted upon swiftly. Please keep me updated on the progress of bill 1342. Rohnert Park has little time to waste in this matter.

Thank you,

Tessa M Berg

Tessa M Berg

cc: Congresswoman Lynn Woolsey
Secretary Gale Norton, Dept of Interior
Armando Flores, Mayor, Rohnert Park, CA

RECEIVED
R/M 9-15-03

August 25, 2003

206

RECEIVED
SEP 10 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Senator Diane Feinstein
One Post Street
Suite 2450
San Francisco, CA 94104

RE: S. 1342

Dear Senator Feinstein:

Thank you for authoring S. 1342, an amendment to the Graton Rancheria Restoration Act. I support this bill because as a resident of Rohnert Park, CA, I would like to see the Secretary of the Interior work with our local officials to ensure that the proposed casino will not be detrimental to the surrounding community (traffic, water and sewer concerns).

Please do all that you can to get the bill passed and signed into law as soon as possible. Also, please keep me posted on the progress of the bill.

Sincerely yours,

Cathleen Springer
6478 Meadow Pines Avenue
Rohnert Park, CA 94928
cjspringer@neteze.com

cc: Congresswoman Lynn Woolsey
Secretary Gale Norton
Mayor Armando Flores

RECEIVED
BY Bm DATE 9/23/03

RECEIVED
03 SEP -5 AM 9:03
OFFICE OF THE
EXECUTIVE SECRETARIAT

592628

nator Diane Feinstein
Post Street, Suite 2450
1 Francisco, CA 94104

(207)

RECEIVED
SEP 10 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

ust 21, 2003

ar Senator Feinstein,

I would like to begin off by thanking you for
thoring S. 1342, an amendment to the Graton Rancheria
estoration Act. I have lived in Rohnert Park for over 20 years.
came to this city as a child. I decided to stay here
d raise my own family because I like the cities
mily orientation. I have watched Rohnert Park grow
d change over the years. I was very sorry to hear that
casino may be coming into our city. I was even more
orry that as a lifelong citizen I didn't have any
nput into this decision.

I hope you can get this bill passed and
signed into law as soon as possible. Please keep
me updated on the progress of the bill.

EXECUTIVE SECRETARIAT
OFFICE OF THE
03 SEP -5 AM 9:04
592635
RECEIVED

Thank you,

Jennifer Dorn
433 Mariner Place
Rohnert Park CA 94928

RECEIVED
DATE 9/23/03
BY N/A

208

August 15, 2003

592006

RECEIVED

03 AUG 26 AM 9:05

OFFICE OF THE
EXECUTIVE SECRETARIAT

Diane Feinstein
331 Hart Senate Building
Washington, DC 20510

Dear Senator Feinstein,

Thank you for authoring S. 1342, an amendment to the Graton Rancheria Restoration Act. I live in Rohnert Park, which is one of the locations under considerations for the casino they are wanting to build. I moved up here because I like the small community feel of this place. I like the fact that there are wild things very close to where I live. I want to be able to protect the place I live.

Its upsetting to me to know that the tribes can build anywhere they want. Not only that but they contribute nothing really to the surrounding community except to increase the traffic and have a major impact on our city. Our streets are not geared towards the amount of traffic involved in such a large place. We need to be able to protect our wildlife and our communities. So I am totally in support of your efforts to pass this bill. I hope its passed as soon as possible before a site is confirmed for the casino.

Please keep me informed about the progress of this bill.

Sincerely,

Jessica Wolfe
8015 Mainsail Dr.
Rohnert Park, CA 94928
pantherdreamin@aol.com

cc: Congressman Lynn Woolsey
Secretary Gale Norton, Dept. of the Interior
Mayor Armando Flores, Rohnert Park

RPM 9/23/03

My name is (Print) Sherri Blocker

I live at 4485 Labath Ave Santa Rosa, CA

My telephone # is 707-588-8620

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Sherri Blocker Date 8-5-03

RPM 9/23/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

218

RECEIVED

2003 SEP 10 P 4:09

EXECUTIVE SECRETARIAT

September 1, 2003

Aurene M. Martin
Deputy Assistant Secretary-Indian Affairs
U.S. Department of Interior
1849 C Northwest MS-4140-MIB
Washington, DC 20240

Dear Ms. Martin:

I am 47 years old U.S. citizen, married with two teenage daughters. I am also a 6th grade public school teacher. I have consistently voted in local, state and federal elections since 1976.

I am one of thousands of citizens who is vehemently opposed to the building and operating of a Vegas-style casino on county land bordering the city of Rohnert Park in the center of the Santa Rosa valley in Sonoma county, California. I am opposed to the casino for environmental, economic and social reasons (Please see attached).

The land on which the Federated Indians of the Graton Rancheria in partnership with Station Casinos, Inc. seek to build a casino should not be signed into trust and given reservation status.

Sincerely,

Dan Swedenborg

494 Swain Ave.
Sebastopol, CA 95472

RECEIVED
SEP 11 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RECEIVED 9/23/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 1, 2003

Ms. Gail Norton
The Secretary of the Interior
U.S. Department of Interior
1849 C Street, NW Rm 6122MS 7229
Washington, DC 20240

Dear Ms. Norton:

I am a 47 years old U.S. citizen, married with two teenage daughters. I am also a 6th grade public school teacher. I have consistently voted in local, state and federal elections since 1976.

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Sincerely,

Dan Swedenborg

RECEIVED
BY AM DATE 9/23/03

494 Swain Ave
Sebastopol, CA 95472

RECEIVED
03 SEP 11 AM 9:19
OFFICE OF THE EXECUTIVE SECRETARIAT
592939

(211)

Joe and Carolyn Pimentel
3647 Melcon Lane
Santa Rosa, Ca 95407
707-585-0245 fax: 707-588-0402

Reg Dir
Dep Reg Dir
Reg Adm Ofer
Route RM
Response Required
Due Date
Memo Ltr
Tele

Re: Does Anyone Care?

To Whom It May Concern:

I am writing you to ask for help! Regarding the Graton Rancheria wanting to purchase a blanket field of awesome land who's home to many birds, salamanders and wild geese. The land I am referring to is located just outside of Rohnert Park, California. I live just 3 short miles away from this virtually empty farmers paradise. Around this field lyses small farm like homes, and ranches that cultivate hay, horses, cows and other farm like feathers. I am asking you to picture this in your head for a moment. Now picture a large, massive Casino and Motel with a huge parking lot, yes in the midst of all this wildlife freedom. Sound out of place? Many of us believe so!

My neighbors, some just across the way from this proposed massive casino site, feel infringed upon, angry, mortified, duped, sadden and shocked that our farm like pastures are now in jeopardy. From our wells running dry to wastewater disposal, from flood control issues, to massive vehicle traffic. From quiet and serene with overhead geese squawking, to loud noise that controls the air. All of this, our concerns and opinions fall on the Rohnert Park Counsel and most of the Sonoma County Supervisors deaf ears.

I talked with one neighbor who was in tears, she felt helpless and said if they widen Wilfred Avenue, (which is proposed for traffic issues) the road will be at her doorsteps. These neighbors as well as myself have lived in this southwest community for more than 10 years, some neighbors even longer. We moved to the country for peace and quiet, away from the streets of the city even though the city is not far, the sounds of wildlife are all around. We exchange the smells of manure for the frogs that croak in the night, we exchange the well waters for the multiple birds that flock about from farm to farm. We exchange driving on smaller roads, and swelled culverts during the winter for peace sounds of wind and rain hitting our windows. We exchange flooded land, for the chance to gaze out and see birds we never seen before. Now all they want us to have is noise, traffic, buildings, asphalt, crime and a lot of people. We feel as though we are being pushed out, told to go away and our property and feelings mean nothing. The old mighty buck means more than all of this...

The county keeps saying their hands are tied. Please untie them. The Rohnert Park City Counsel doesn't care, they have run their books into the ground and this is their way of bailing out. Surely, there is another way. Why should the land, wildlife and people suffer because of their book keeping problems?

What is the saddest of all, is that I find myself angry and bitter towards the Indians, all of them. I feel they have taken advantage of the state and community. They don't care what they destroy as long as they enrich them selves with money. It is not right nor is it fair. Please stop this from happening, a lot depends on what you do. Please care.

Sincerely,

Carolyn Pimentel

RECEIVED
BY Kim DATE 9/25/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

ES RECEIVED
03 SEP 11 PM 5:13
OFFICE OF THE
EXECUTIVE SECRETARIAT

592981

Sept. 10, 2003

Dear Gail Norton,

I am writing in opposition to a proposed casino on a site just outside Rohnert Park, California. I am urging you not to grant a Trust to the Federated Indians of Graton Rancheria. (It is my understanding that the Graton Rancheria had disbanded and are now back together probably at the urging of Las Vegas backers.)

I think American Indians deserve all the breaks we can give them, but the proposed site is not a good one for a casino. The site which is currently used for livestock is a buffer zone between two growing cities. The strain on our roads and water supply would be great. Rohnert Park was designed for families. Every home is within walking distance to at least one playground and an elementary school. A casino would definitely change the atmosphere and potentially bring crime to our family friendly city. I think our quality of life would be changed for the worse. Thank you for your consideration.

Gale F Davis

Gale F. Davis
8508 Lombard Way
Rohnert Park, CA 94928

RECEIVED BY DATE 9/23/03

SEP-11-2003 THU 10:09 AM FROM:MRE#2392 FAX:17/20011D3

(213)

To: Aurene M. Martin, Deputy Assistant Secretary-Indian Affairs
US Department of Interior
1849 C Northwest MS-4140-MIB, Washington, DC 20240
Fax# (202) 208 5320

My name is George Mojica a small business owner and resident in the town of Rohnert Park, Ca.

Myself and most of our residents are against a proposed Indian Gaming Casino (Station Casino of Nevada), which is to be built on 360 acres in our county less than a half mile from schools, less than a quarter of a mile from our movie theater and local shopping. In a town with 40,000 residents and a small safety force, we will be subjected to higher crime rates, additional traffic burdens and our children subjected to a feverish way of life. Although 98% of the citizen that will frequent The Casino are law abiding, but statistics show that were there is gaming crime has risen by 60%.

Our officials have entered into a preliminary agreement (against the wishes of the majority of its citizens) to allow this Casino to be built (Las Vegas Style) near our homes and play grounds. We have organized and have over 10,000 signatures saying No to The Casino. These signatures were gathered in 7 days.

This Casino will affect our entire county. The neighboring towns of Sebastopol, Cotati, Santa Rosa and Penngrove are also preparing petitions saying No to The Casino.

In the past few years the building of homes were slowed down in this immediate region because our water table is depleting, our citizens are already using constraints in the use of our precious water. The same officials who would not allow affordable homes to be built are saying yes to Casino and 300 room hotel.

The surrounding farmers and homes in this immediate area are witnessing the water wells going dry. The proposed site of this Casino is to be built directly over the sensitive under ground water table. The Water Commission of this region also over the last ten years have sent warnings to the local officials of the sensitivity of this water table and the drastic effects it will have on the communities if caution is not given to this issue.

We or I would appreciate if your office could assign someone to look into this matter before it's too late and your citizens are forced to relocate.

Thank You

George Mojica
6950 Commerce Blvd,
Rohnert Park, Ca 94928
Fax# 707 664 1799
Tel# 707 664 9391

RECEIVED
SEP - 9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

9/23/03

FROM : Robert O Dell

ES

214)

RECEIVED

03 SEP -9 PM 1:26

OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) Robert Ompezo

592796

I live at 200 willow green Place Santa Rosa CA

My telephone # is 707 542.6200

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Robert Ompezo Date 9/8/03

RECEIVED

RFM 9/23/03

RECEIVED

SEP 15 2003

BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) NATALIE CRAIG

I live at 5241 OLD REDWOOD HWY #E Santa Rosa

My telephone # is 707-577-7794

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 9/8/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RM 9/22/03

My name is (Print) SANDRA CONANT

I live at 1294 BLOOMfield RD. SEBASTOPOL, CA

My telephone # is 707 829-5388

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Sandra Conant Date 9-8-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

9/23/03

(217)

My name is (Print) Josephine Oropeza

I live at 200 willowgreen Place Santa Rosa CA

My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Josephine Oropeza Date 9/8/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RECEIVED
RM 9/23/03

My name is (Print) ADAN CHAVEZ

I live at 2133 QUINTIN PL. SANTA ROSA CA 95407

My telephone # is 707 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature adan chavez Date 9/08/03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RJM 9/23/03

My name is (Print) Robert O'Dell

I live at 4471 Labath Ave, Santa Rosa, CA 95407

My telephone # is 707 585 2632

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Robert O'Dell Date 9-7-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RECEIVED 9/23/03
PM

My name is (Print) Jennifer Burton

I live at 9001 conde LN #2 windsor CA 95492

My telephone # is (707) 620-1055

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jennifer Burton Date 9-6-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

MM 9/22/03

My name is (Print) Alberto Yanez Sr.

I live at 766 Brittain Santarosa CA 95403

My telephone # is 526-4309

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Alberto Yanez Sr Date 9-6-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RPM 9/23/03

My name is (Print) Tim Blocker

I live at 4485 2ABATh SanTa Rosa Cal 95403

My telephone # is 588 8620

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Timothy J Blocker Date 9-6-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RJN 1/23/04

223)

RECEIVED
SEP 10 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Dear Senator Feinsten,

Thank you for authorizing S. 1342, an amendment to the Graton Rancheria Restoration Act. My family has Lived in Rohnert Park for 26 years, we are very concerned, especially on the impact it will have have on the youth of our community.

We are asking you to move forward quickly to pass this bill and signed into law as soon as possible.
Please keep us up to date on this current issue.

Sincerely,
Linda S. Luna
802 Carlita Circle
Rohnert Park, CA 94928

BY RPM DATE 1/23/07

592638

RECEIVED
03 SEP -5 AM 9:04
OFFICE OF THE
EXECUTIVE SECRETARIAT

My name is (Print) Jessica Burton

I live at 766 Brittain Ln. Santa Rosa CA, 95403

My telephone # is 526-4309

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Jessica Burton Date 9-6-03

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RPM 9/23/03

130

DATE
9-5-03

Interior Secretary Gale Norton,

'225

I urge you to not place in trust the new lands of the Federated Indians of the Graton Rancheria.

Sincerely COAN
Chris Coa

1564 Kingsley Dr
Pittsburg 94565-6322

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RECEIVED
RM 9/23/03

RECEIVED 2267

592989

03 SEP 12 AM 9:15

OFFICE OF THE
EXECUTIVE SECRETARIAT

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

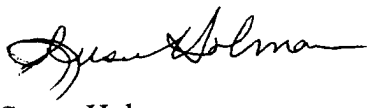
September 5, 2003

Senator Diane Feinstein
One Post Street
Suite 2450
San Francisco, CA 94104

Dear Senator:

I support the bill you authored (S.1342), which would give local communities input into the decision making process for casino locations. Please get this bill passed and signed into law as soon as possible.

Sincerely,



Susan Holman
1506 Garfield Court
Rohnert Park, CA 94928

~~cc: Congresswoman~~ Lynn Woolsey
~~cc: Secretary Gale Norton~~
cc: Mayor Armando Flores, Rohnert Park

RECEIVED
RPM 9/23/03

Sep 05 03 01:59p

227)

RECEIVED
SEP 11 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Sept 5, 2003

Honorable D. Cheney, Vice Pres. of the US
the White House
c/o Chief of Staff, Lewis Libby
1600 Penn. Ave
Wash D.C.

RECEIVED
2003 SEP 10 P 5:11
EXECUTIVE SECRETARIAT

I Am A Resident of Rohnert Park, CA.
Rancho Verde Mobile Home Park NEXT DOOR
TO The Proposed CASINO.

I AM IN OPPOSITION TO The CASINO
I DO NOT WANT this Rancheria CASINO
IN MY City.

PLEASE USE YOUR offices TO ASSIGN
SOMEONE TO LOOK INTO this MATTER
Before IT IS TOO LATE AND WE LOSE
TO The Gambling INTEREST OF The
Democratic PARTY

592729
RECEIVED
DATE 9/23/03
03 SEP -8 PM 2:06
OFFICE OF THE
EXECUTIVE SECRETARIAT
RECEIVED

LARRY + MARIE ESPARZA
44 VERDE CIR
ROHNERT PARK, CA 94928
707-584-5522

228

RECEIVED
SEP - 9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

101 International Inc.
6100 Redwood Drive, Rohnert Park, CA 94928
707-584-1610 Phone 707-584-7668 Fax

Date: 9/3/03 **From:** PHIL TALAMANTES

To: AURENE M. MARTIN

Company: DEPUTY ASS'T SECRETARY - INDIAN AFFAIRS

Fax: _____ **Pages (Inc. Cover):** 1

Subject: I WOULD LIKE TO GO ON RECORD AS OPPOSING THE PLACEMENT OF A CASINO IN ROHNERT PARK, CALIF - OUR INFRASTRUCTURE IS AT GRIDLOCK AS IT IS. I HAVE OPERATED A BUSINESS HERE FOR 27 YEARS AND WE DON'T NEED THIS TYPE OF BUSINESS HERE

Thank you
Phil Talamantes

PROCESSED
AM
9/23/03

229

Date: SEPT 3, 2003

FAX TO:
AURENE M. MARTIN
DEPUTY ASSIST. SEC-INDIAN AFFAIRS @ WASHINGTON DC

from Dave & Kathy Biggs 308 Bloomfield Road, Sebastopol CA 95472
fax # 707 584-7668 business phone 707 584-1610 home phone 707 823-2911

Subject: PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA
# of pages including this cover sheet 1

WE WANT TO GO ON RECORD AS OPPOSING THE PROPOSED INDIAN CASINO IN ROHNERT PARK, CALIFORNIA. I HAVE WORKED IN ROHNERT PARK FOR 27 YEARS AND HAVE WATCHED THE STRUGGLE OF THE CITY OF ROHNERT PARK AND CALTRANS TO KEEP ROADS AND THOROUGHFARES IN REASONABLE CONDITION TO HANDLE THE RAPID GROWTH, USUALLY UNSUCCESSFULLY.

THE SITE CHOSEN IS PART OF AN AGRICULTURAL SEPARATOR FOR THE CITY AND OTHER COMMUNITIES MOST OF THE "AMBIANCE" THAT REMAINS WOULD BE LOST IF THIS CASINO IS ALLOWED TO BE DEVELOPED.

RECEIVED
SEP -9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

RM 9/23/03

ES

230)

RECEIVED

03 SEP -8 PM 1:45

592723

September 3, 2003

OFFICE OF THE EXECUTIVE SECRETARIAT

RECEIVED

SEP 15 2003

BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Gail Norton
Secretary of the Interior
1849 C Street. NW Room 6122 MS 7229
Washington, DC 20240

Dear Gail Norton:

I am a resident of Rohnert Park, CA where Station Casinos and The Graton Federation Rancheria are proposing to build a Casino. This Casino is being built in a wetland area less than a half a mile from schools, movie theaters and local shopping. Myself and other residents in Rohnert Park are adamantly opposed to this Casino.

I don't believe a thorough study by Station Casinos and The Graton Federation Rancheria has been done on environmental issues, water issues, and our infrastructure. If this Casino is built it will put a tremendous strain on our resources.

In the past few years building permits have been denied in our area because our water table is depleting. The same officials that do not allow affordable homes to be built in our area are now saying yes to a Casino. The proposed site of this Casino is directly over the sensitive ground water table.

Our City Council has entered into a preliminary agreement to allow this Casino to be built. The residents of Rohnert Park have spoken to the City Council and have stated their concerns. We have organized and are well on our way to 10,000 signatures saying **NO TO THE CASINO**. And Yes to our Water.

We would appreciate if your office could assign someone to look into this matter before it is too late and our city becomes a ghost town.

Sincerely,

Rosemary Mojica
PO Box 1455
Rohnert Park, CA 94928

RECEIVED
RM 9/23/03

231

RECEIVED
SEP 10 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

130

Wednesday, September 03, 2003

RE: **AGAINST THE PROPOSED CASINO IN ROHNERT PARK, CA**

Dear Gail Norton, Secretary of the Interior:

Against the expressed will of the overwhelming majority of its citizens, Rohnert Park Mayor and City Council have decided to negotiate with the partnership of Stations Casino, Inc. and the Federated Indians of Groton Ranchero to establish a gaming facility in Rohnert Park (RP).

I was at the last, Wednesday, August 27, 2003, the RP City Council meeting where the mayor and council members overrode the will of the majority of our citizens to stop the casino.

The negative impacts to our community clearly outweigh the benefits. And introducing a Trojan horse, a sovereign nation, which has no legal obligation to the community in which it resides spells big trouble for all of us. The record is clearly shown in Southern California, for example, Ramona.

The crime rate around casinos is 84 percent higher than the national average. Existing businesses around casinos are driven out of business, after the casino has begun operation. The record is clear and not pretty, if you choose to research it.

The proponents are telling you there in Washington we, the people of Rohnert Park, support the casino. **It is a lie.** You only have to read our recent newspapers and talk to its residents to find out otherwise.

Please do all you can to stop Gaming Industry Takeover in Rohnert Park, California.

Johanna T Cancro
7343 Castille Ct
Rohnert Park, CA 94928

RECEIVED
2003 SEP -9 P 4:01
EXECUTIVE SECRETARIAT

RECEIVED
RJM 9/23/03

232 / 130

Wednesday, September 03, 2003

RE: **AGAINST THE PROPOSED CASINO IN ROHNERT PARK, CA**

Dear Aurene M Martin, Deputy Assistant Secretary-Indian Affairs:

Against the expressed will of the overwhelming majority of its citizens, Rohnert Park Mayor and City Council have decided to negotiate with the partnership of Stations Casino, Inc. and the Federated Indians of Groton Ranchero to establish a gaming facility in Rohnert Park (RP).

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Please do all you can to stop Gaming Industry Takeover in Rohnert Park, California.

Alfred J Kottman
7343 Castille Ct
Rohnert Park, CA 94928

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

EXECUTIVE SECRETARIAT
2003 SEP -9 P 12:44
RECEIVED

RECEIVED
DATE 9/23/03

233

September 2, 2003

Aurene M. Martin
Deputy Assistant Secretary-Indian Affairs
US Department of Interior
1849 C Northwest MS-4140-MIB
Washington, DC 20240

Dear Aurene M. Martin;

I find no option but to let you know personally that I am adamantly opposed to a Casino in Rohnert Park, CA to be operated by The Graton Rancheria Tribe. Please do not let the land they have an Option under, be granted under Trust. The Citizens of Rohnert Park are strongly opposed to a Casino in our community. I have personally gathered 100's of signatures and will gather 1000's more. Washington has been told the citizens are for it but this is incorrect information. We were never told of the proposed site by our City Council, until it hit the papers.

Rohnert Park does not have sufficient water or sewer to handle a World Class Casino! We just installed water meters this year. We have combined fire/police officers we couldn't possibly handle the increase need for police protection. Our traffic on 101 is already at grid lock during commute hours, our citizens can not tolerate 24 hour gridlock!

Our infrastructure will collapse if the Bureau of Indian affairs grants Trust status!! We the citizens of Rohnert Park, CA say NO!!!

BETTY ANNE GOULD

704 Brett Avenue • Rohnert Park, CA 94928 • (707) 792-1573

RECEIVED
SEP - 9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

August 27, 2003

Ms. Aurene M. Martin
Deputy Assistant Secretary of Indian Affairs
U.S. Department of the Interior
1849C Northwest MS4140MIB
Washington, DC 20240

Dear Ms. Martin:

This letter is written to voice my strong opposition to the Graton Rancheria Indian tribe acquiring property in the city of Rohnert Park for the purpose of building a casino and hotel complex.

This deal is not supported by the residents of Rohnert Park. Rohnert Park is a family-oriented community and its design, amenities, and neighborhoods reflect this.

The thought of a casino in this community is outrageous. Please take action to stop the advancement of this plan immediately.

Sincerely,

Betty Anne Gould

RECEIVED
2003 SEP -4 P 4:19
EXECUTIVE SECRETARIAT

RECEIVED
9/23/03

48 Regents Circle
Rohnert Park, CA 94928

235

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

August 26, 2003

Senator Diane Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

48 Regents Circle
Rohnert Park 94928

Re: S. 1342

Dear Senator Feinstein.

Thank you for authoring S. 1342. I want my community to have input into the casino decision. Please move quickly to get this bill passed and keep us updated on the progress of this bill.

Sincerely.

Jackie Nevenx

OFFICE OF THE
EXECUTIVE SECRETARIAT
RECEIVED
03 SEP 11 AM 9:19
392940

cc: Lynn Woolsey, Congresswoman
Gale Norton, Secretary, Dept. of Interior
Mayor Armando Flores, Rohnert Park

(236)

RECEIVED
SEP 10 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

August 26, 2003

The Honorable Dianne Feinstein
United States Senate
One Post Street, Suite 2450
San Francisco, CA 94104

RE: Senate Bill 1342

Dear Senator Feinstein:

Thank you for authoring Senate Bill 1342, an amendment to the Graton Rancheria Restoration Act.

It is important that citizens in the North Bay (Sonoma County) have the ability to give input into a decision that will have such far-reaching repercussions. Please help get this bill passed and signed into law as soon as possible. We would appreciate being kept updated on the progress of this legislation.

As residents of Rohnert Park, we are appalled that the City government is trying to shove this deal down the residents' throats without the benefit of full public hearings and disclosure. Major problems exist with water and sewer capacity, impact to local roads and highways, and the lack of affordable housing in the area, just to name a few.

Any help you can give will be much appreciated.

Sincerely,

Katie Crump

Bill and Katie Crump
6841 Avenida Cala
Rohnert Park, CA 94928

cc: Congresswoman Lynn Woolsey, 1101 College Ave., Suite 200, Santa Rosa, CA 95404
Secretary Gale Norton, Dept. of the Interior, 1849 C Street NW, Washington, D.C. 20240
Mayor Armando Flores, Rohnert Park City Hall, 6750 Commerce Blvd., Rohnert Park, CA 94928

RECEIVED
03 SEP -5 AM 9:03
OFFICE OF THE
EXECUTIVE SECRETARIAT

592633

RECEIVED
BY RM DATE 9/23/03

237

To Bureau

Bureau of Indian Affairs
Pacific Region
2800 Cottage Way
Sacramento, Ca 95825

RECEIVED
03 OCT -2 PM 1:12

9/30/2003

RE: a future gaming casino in the Rohnert Park, California area

Many letters and meetings have taken place to let the "powers that be" know that this type of business is NOT wanted in this area. It is a highly populated area; the people SHOULD have a say in what is brought into their community , but this issue seems about to be ramrodded into existence. We don't agree with having gaming casinos AT ALL in California, but we realize that we are outnumbered in this line of thinking. There is already a highly successful casino north of our area, in Hopland, Ca., and there is also one in the Middletown, Ca area, not too far from here. The people of Sonoma County DO NOT want another one, ESPECIALLY in such a highly populated area as has been designated. This type of activity is NOT conducive to growing families and their related neighborhood activities.

PLEASE reconsider this proposal, and if the people in an area express such a strong desire NOT to have this type of business in their area, please RESPECT those wishes. This venture would only bring undesirable elements into a community that has worked hard to cultivate family values and activities; this business of casinos is a direct OPPOSITE to those values.

Sincerely,
Ed and Patty Martin

(signed) Ed Martin

(signed) Patricia Ann Martin

1310 Montgomery Rd.
Sebastopol 95472-7031

Received
KPM 10-3-03

Peggy Soares
4319 Primrose Avenue
Santa Rosa, CA 95407

2381

RECEIVED
03 OCT -9 PM 1:07

Bureau of Indian Affairs
Sacramento Area Office
Attn: 2800 Cottage Way
Sacramento, CA 95825

RE: Graton Rancheria Casino Proposal

To Whom It May Concern::

The Federated Indians of Graton Rancheria recently announced plans for a major Las Vegas –style casino on 366 acres of privately owned land in Southern Sonoma County. We live one block away from the proposed site near Rohnert Park. We have lived in this house for 25 years and we have raised our 4 children here. We have put thousands of dollars into our home and thousand of hours of hard work. This is where my husband and I planned on retiring. All of this is about to be gone because, Rohnert Park thinks this is a quick fix to their financial problems. And our financial problem will just begin. Property values will drop off considerably. Wells will go dry in the summer and properties will flood in the winter, if this casino is allowed to go into our community. Not taking into consideration the problems this will cause the rest of Sonoma County, and California.

It seems like no one is considering the negative impact this is going to have on the wells out here. Rohnert Park is already feeling the water shortage, and many of my neighbors have already had their wells go dry. Where exactly do you think the aquifer water will go after the casino drills their 1000 foot wells? Water doesn't drain uphill. The flooding seems to get worse every year. If you pave over that much open space, do they think there will be less flooding?

This is not just land used for grazing cattle, to fully appreciate this land and all the animals that live here you would truly have to see the vast amount of wildlife we have out here. Red-tailed hawks, red-shouldered hawks, barn owls, screech owls, great horned owls, short eared owls, great blue herons, hooded night herons egrets, buffle heads, cinnamon teals, Canada geese, cooper's hawks, blue birds, orioles, just to name a few of the birds. We also have red and gray foxes, coyotes, raccoons, skunks, turtles, otters and yes "Tiger Salamanders". These will all disappear with the construction of a casino. A casino doesn't belong in a residential neighborhood, it surely doesn't belong in an environmentally sensitive area, and it doesn't belong on this site. Surely there are more appropriate places in the county for this type of development.

Sincerely,

Peggy Soares

RPM DATE 10/10/03

Peggy Soares
Southwest Santa Rosa
(707)585-3635

239

October 17, 2003

Bureau of Indian Affairs
Pacific Region
2800 Cottage Way
Sacramento CA 95825

Greetings,

I want to register my protest to the proposed casino in Rohnert Park as loudly as humanly possible.

This kind of establishment in an urban area, near a college as well as other schools, is certainly not in the best interests of our children. The home owners in the immediate area (many with children), almost without exception, are totally against this casino in their neighborhood.

It also is not good for the small businesses in the area. Much of the time and money spent at the casino would have been spent at other places of entertainment, restaurants, etc. in the area.

The jobs it is supposed to create will be mostly low paying jobs and not enough to live in this expensive area.

It will put a further burden on the already crowded Highway 101 and the other streets in that area.

It attracts an element that will contribute to an increase in crime and other problems in the area.

This project is to be located on wetlands where there are many environmental issues. Why has this not been brought up?

Reports have been received from other areas where they have Indian gaming, and big promises were made of positive contributions to the community and not kept.

The majority of the people in the Rohnert Park area as well as Sonoma County are against this addition to our community. It is sad that the City Council of Rohnert Park has ignored the wishes of their own people, and Sonoma County Supervisors have done little or nothing to prevent it from happening.

I respectfully ask that you do whatever you can to keep this casino from coming to Rohnert Park.

Sincerely,

Pearl Burkart

Pearl J. Burkart
3236 Indian Rock Court
Santa Rosa CA 95404

RECEIVED 10/20/03

9/20/03

RECEIVED
03 SEP 30 AM 9:01
OFFICE OF THE
EXECUTIVE SECRETARIAT

Attn: 694130

Gail norton,

I strongly disapprove of the casino planned for the city of Rohnert Park, CA.

Thank you
Siobhain Bradford
Concerned Resident

Siobhain Bradford
7258 alma ave
Rohnert Park, CA 94928

RECEIVED
2003 SEP 30 AM 9:01
OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) JANE HERMAN

I live at 1825 Little John Ln Santa Rosa

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will [illegible] undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 11/12/03

(242 -

130

My name is (Print) Cathryn Halford

I live at 1823 Turtle Creek Way

My telephone # is 707-778-3750

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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Sincerely,

Signature [signature] Date 10.12.03

(243)

My name is (Print) Holly R Hamm

I live at 1900 Sestri Ln #126 Petaluma, CA

My telephone # is 707 769 8899

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10-12-03

My name is (Print) Charles Cook

I live at 1823 Turtle Creek Way, Petaluma 94954

My telephone # is 707-778-3750

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 10/4/03

245

October 17, 2003

I AM **NOT** IN FAVOR OF PUTTING A CASINO IN ROHNERT PARK, CALIFORNIA. WE ARE A FAMILY ORIENTED COMMUNITY.

PLEASE STOP THE CITY COUNCIL FROM RUINING OUR CITY.

PATTIE BURNETT
1351 PARKWAY DRIVE
ROHNERT PARK, CA 94928

(707) 285-3525

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME TAMI CARTER

ADDRESS 405 HORN AVE, SANTA ROSA, CA

SIGNATURE

DATE 10.12.3

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

Gloria Hafner Allee

NAME Gloria Hafner Allee

ADDRESS 752 Lindsay ave Rohnert Park

SIGNATURE Gloria Hafner Allee

DATE Sept 19 2003

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Cora Lee Root

ADDRESS 6357 Country Club DR-208 R. P. CA 94928

SIGNATURE Cora Lee Root

DATE 9-20-'03

RECEIVED
2003 OCT 23 31
EXECUTIVE SECRETARIAT

RECEIVED
OCT 22 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

October 20, 2003

Attention: M. Martin
Assistant Secretary- Indian Affairs

Several Things that should concern you about the casino that the Graton Rancheria Tribe would like to put in, (Rohnert Park) out side our city limits in the county, which is right next to the city itself.

1. The size and scope of the casino complex will have a severe effect on our water supply.
2. Increase traffic on US 101 and streets around town will be become overcrowded (again). This is what has happened on HWY 16 outside the Cache Creek casino in Yolo.
3. Overall crime in our "friendly City" is expected to increase. US News and World reports that crime in casino cities is roughly 84% higher than the national average.
4. The casino will likely have a negative effect on the local economy by removing money from local businesses.
5. The Granton tribe will not be required to abide by any state or local regulations, including minimum wage, environmental workers compensation to name only a few. They pay no taxes to the city, county or state and yet we are required by law to provide them with police and fire protection.

Sincerely
Evelyn Schneckloth
Evelyn Schneckloth
6365 San Benito Dr
Rohnert Park, CA 94928
Phone 707-588-9359

(250)

Rohmert Park, California
October 3, 2003

130

RECEIVED

03 OCT 21 AM 9:22

OFFICE OF THE
EXECUTIVE SECRETARIAT

695370

Gail Norton, Secretary of Interior
1849 C St. Northwest
MS4140 MIB
Washington D. C. 200240

PLEASE, NO CASINO IN ROHNERT PARK!

The city has traffic problems, water problems and Budget problems.

I fear the burden of added traffic, water usage will be too big to handle

PLEASE NO CASINO!!!!!!

Thank You,

Elenore J Schoen

Elenore J Schoen

BY FACSIMILE (202) 456-7044

Date: Sept 21,03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

Signed: Debra D. Haw

Address: 116 Yale Court Vallejo Ca - 94589

Phone: 707 642 -3987

252 - 130

10/21/03

TO: Aurene M. Martin
Assistant Secretary-Indian Affairs
US Dept of the Interior
Washington, D.C.

FROM: Christie Stucker
875 Millbrae Ave
Santa Rosa, CA 95407 (707)585-0564/ (707)753-3073

RE: Graton Rancheria Casino Resort Opposition
BILL #HR2656

I am a single mother with two daughters ages 20 and 17, both work in Rohnert Park and I am concerned about their safety and of all the youth of this area if a casino/resort/bar is allowed in an environmentally-protected rural area. The traffic alone is impossible now. I have held three jobs at once while raising my girls so I could afford to buy the 20 acres we own on the west side of Stony Point Rd. and I could provide them with a quality of life that is now threatened. I have lived in Sonoma Co. for over 40 years and have never been so disgusted with my local government officials. There are too many negative impacts to ignore: land use, traffic, water, and environmental issues. The Graton Rancheria Tribe does not have my blessings nor do they care about my concerns as a tax paying property owner or about my quality of life. I'm sure if the tables were turned you would not want a 24 hr gambling establishment in the back yard of your community either.

Respectfully submitted,

253)

6410 Bennett Valley Road
Santa Rosa, CA 95404

August 7, 2003

RECEIVED
03 AUG 15 AM 9:56
OFFICE OF THE
EXECUTIVE SECRETARIAT

591616

.Honorable Gail Norton
Secretary of the Interior
Department of the Interior
Washington, D.C. 20240

Dear Ms Norton:

I am writing you to ask your assistance in opposing the Station Casino and Federated Indians of Graton Rancheria proposed casino project.

The first significant point is that when Boxer introduced the resolution to restore the tribes status, (H.R. 5528 – Boxer), much of the support for the bill was based upon the tribes "pledge" not to conduct gaming. If their pledge is broken that makes the approval for the restoration moot, and no tribal restoration is valid. This is a legal question, and overlooked by the majority.

In addition, there are other legal implications. There are established Federal regulations that govern the "fee to trust" process, that require the Bureau of Indian Affairs to evaluate the environmental impacts of a trust application and consider local and state government input. Graton's trust application should not be considered any different than any other tribe attempting to take private land and transfer it from the state to sovereign status.

The area currently considered is zoned agricultural, includes wetlands, and is environmentally sensitive. In fact, it is one of the most environmentally sensitive areas in the Bay Area. When ranchers attempt to use such areas for agriculture, the approval process takes many years and is extremely difficult to obtain any approvals.

In addition to the above, building a 2000 acre gaming center would totally destroy the area for current residents and their agricultural operations.

We request your support in denying this application.

Sincerely yours,

J. E. Lepetich

OCT 22
OF INDIAN AFFAIRS
GAMING MANAGEMENT

254

695193

RECEIVED

03 OCT 16 AM 9:52

OFFICE OF THE
EXECUTIVE SECRETARIAT

October 15, 2003

Gail Norton
Secretary of the Interior
1849 C Street Northwest
MS 7229
Washington D. C., 20240
FAX 202-208-6956

Dear Secretary Norton:

I am writing again to implore you to do everything in your power to squelch the building of a casino by the Federated Indians of Graton Rancheria in our small, family oriented community of Rohnert Park, CA. Our city officials are not responding to our sentiment. You have heard the reasons from our community – traffic, irreversible impact on the flavor our friendly city, our children and families, our senior citizens, DUI's, economic drain of resources, environment, etc. The bottom line, this casino does not belong here, it is TOO CLOSE to our homes and will greatly impact our lives, not to mention it's in the middle of some beautiful farmland that people chose to live on for obvious reasons. Please do everything in your power to force either a change of location to a more appropriate and less congested place, or a change of venture. NO casino. This is not a racial issue, it is about the type of venture – one which draws 7,000 to 10,000 daily (as per Lesley Pittman, a vice president of Station Casinos) and lures people into losing their money. It's not a destination for us, it's in our faces and no good can come of it for those of us who live here.

Thank you for your diligence in pursuing this urgent matter.

Jeanine Lively

Jeanine Lively
957 Helene Court
Rohnert Park, CA 94928
707-585-7818

My name is (Print) Chuck Lucas

I live at 4685 Pepperwood Dr Penngrove, Ca 94956

My telephone # is 707-794-8184

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature [signature] Date 10/11/03

256

10/21/03 130

Dear Assistant Secretary Martin,

I am writing to you to discuss a situation, which is critical to the well being of our neighborhood. I live in Cotati, CA (about 40 miles north of San Francisco). Because of the passage of Prop. 1A, the Graton Rancheria tribe of Indians wants to put a gambling casino just oustside the city limits of Rohnert Park, and just about ½ mile west of Highway 101. The casino would be the first of its kind stuck right in the middle of an existing community – with Santa Rosa flanking its north side, Rohnert Park and Cotati on its eastern and southern side and unincorporated Sebastopol on its western side. Because the mayor of Rohnert park and the city council seem to think that it is "inevitable" and a "done deal", they have chosen to negotiate with the tribe to help mitigate some of the effects. The tribe spokesman, Greg Sarris, clearly stated that they would claim that land for a casino PERIOD! The problems for this project are enormous.

The community DOES NOT WANT ORGANIZED GAMBLING THRUST IN THE MIDDLE OF THEIR COMMUNITY! People (myself included) didn't understand that Prop. 1A allowed tribes to buy any parcel of land they wish and then call it their sovereign nation. There is a grassroots move underway to recall every member of the Rohnert Park City Council and all the Sonoma County supervisors because the people in my community feel so strongly about organized gambling and the problems that go along with it (more crime, drugs, traffic etc.)

The General plan in Sonoma County, Santa Rosa, and Rohnert Park have called for this parcel of land to be kept as community separator between the cities because of the wetland concerns, endangered species, the beauty and the sensitive environmental nature of this land. Much community effort and input went into these General Plans. How can Station Casinos in Las Vegas (the financial backer of this project) and a newly formed Indian tribe circumvent this and put a gambling establishment there that our families don't want?

The gambling casino projects making 500 million dollars per year – money that will be sucked from our community and left on card tables and in slot machines in this facility. Given today's economic climate, you must be aware that our communities are suffering enough without this type of drain.

If you've driven on the freeway between Petaluma and Santa Rosa, you know how horrible the traffic presently is. A 500 million-dollar per year gambling casino in the **middle** of these cities will bring traffic to an absolute standstill.

The 48 members of the Graton Rancheria tribe are no more needy than the majority of the rest of the people in California. They go to the same schools and have the same jobs as the rest of us. Yet because they claim to have some Indian ancestry, they are set to be the next group of multimillionaires. I thought our constitution said that all people are created equal. If we say that one race can operate an organized gambling parlor and another race can't, aren't we practicing racism? Unfortunately the Nevada gaming industry is exploiting this loophole, which is why they have a financial interest and investment in all of California's almost 60 casinos.

We desperately need legislation to stop Las Vegas from putting organized gambling and all the crime and substance abuse problems associated with gambling addictions into the very **hearts** of our local communities. I implore you to do something to stop this trend and to help us stop the "inevitable" gambling casino in Rohnert Park.

Sincerely,

John Metras
7659 Isabel Drive
Cotati, CA 94931 (707) 664-8541 jmetras1@excite.com

Anthony and Karol Moreno
1230 Heartwood Drive
Rohnert Park, CA 94928
(707) 585-1332

257 130

695389

RECEIVED
03 OCT 21 AM 9:23
OFFICE OF THE
EXECUTIVE SECRETARIAT

October 15, 2003

Ms. Gale A. Norton
Secretary of the Interior
United States Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Ms. Norton

Our city is currently negotiating with the Graton Rancheria Indian Tribe to construct a gambling casino and hotel complex adjacent to the City of Rohnert Park in California. For the record, we are against building a gambling casino in or near Rohnert Park. This city was planned and built as a family oriented community. As you well know, gambling casinos are not conducive to healthy families. They bring with them increased crime, prostitution, alcohol-related incidents, and poverty. None of these are conducive to raising a healthy family.

We are not racist, or prejudiced against Indians, as we have been charged, we simply do not feel that a gambling casino should be built in a family community. As our elected leaders, we are asking that you represent our views and do what you can to stop this casino from moving forward.

There are many other issues associated with why this casino should not be built. Some of these are as follows:

1. The area currently is having problems providing enough water to its citizens due to a declining water table.
2. The negotiations with representatives from the city council members were conducted in close door meetings, a violation of the Brown Act in California.
3. The area slated for development represents a community greenbelt separator. Therefore, this development is in violation with the county's general plan.

We are asking, along with a majority of the citizens in our city, and county, that you take action now to stop the casino from proceeding.

We will be tracking your involvement in this important matter. For the future of your political career, we recommend that you act wisely on this matter. Thank you for your time.

Sincerely,

Anthony and Karol Moreno

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Mike Morillo

ADDRESS 6185 Don Carlos Ct R/P

SIGNATURE Mike Morillo

DATE 9/20/03

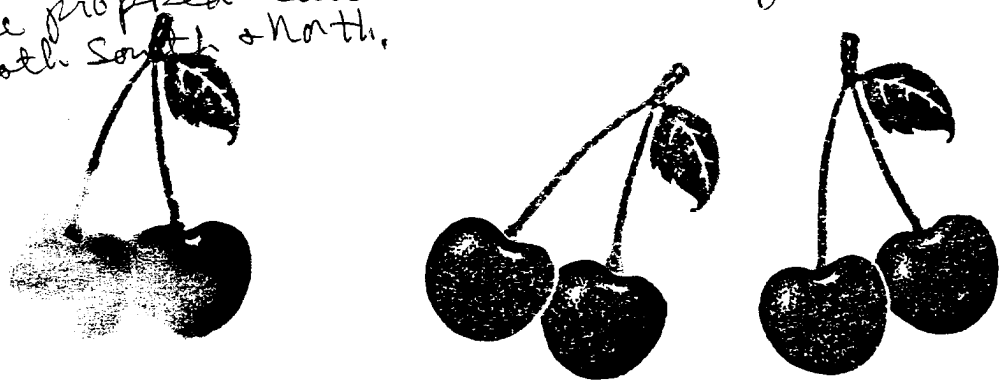
Gail Norton
Secretary of the Interior
1849 C. street
Northwest - MS 4140 - MIB
Washington D.C. 20240
Washington D. C.

695340

Oct. 5, 03
130

RECEIVED
03 OCT 21 AM 9:19
OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear Secretary Norton,
I am writing to ask you to intervene in the proposed building of a casino in our city. We, the citizens of Rohnert Park do not want this Casino built here - we are a family-oriented community more so than anywhere in this country - every section has a Park - fields for baseball, football, soccer etc for the kids - swimming pools in nearly every section. Kids are everywhere & the nightmare of having a casino in this type of neighborhood scares us to death - There will be traffic problems too as the highway leading to the proposed Casino is a two ~~way~~ lane one, both South & North.



The problems that Casinos bring are numerous - fights, drugs, professional gamblers etc.
We have open land & see cows & horses; we do not want a Casino in this kind of environment. It is beautiful here in Sonoma County & we want it to remain so, without the blight of a Casino.
I thank you for reading this & anything you can do to stop this would be greatly appreciated. I ask for your support.

Sincerely

Kathleen Wren Jarvis

130 10-18-03

The Honorable Gale Norton
Seretary of the Interior
1849 C Street Northwest
Washington, DC 20240

RECEIVED
03 OCT 30 PM 12
OFFICE OF THE SECRETARY

I am opposed to an Indian
Cosino in Rohnert Park, Ca.

This is a family town, Traffic
is terrible now and water is scarce..
The casino will bring in crime and gangs
to the city. There is already 2 casinos
in the area.

69598

PLAYSTED

Robert Playsted
38 Chestnut Ct.
Rohnert Park,
94928-2603

ES

(261) 130

FAX

If you have trouble with this transmission, please call 707-588-9926

DATE: 10/30/2003

TO: The Honorable George W. Bush
The Honorable Richard Cheney
The Honorable Dianne Feinstein
The Honorable Daniel Inoye
The Honorable Ben Nighthorse Campbell
The Honorable Orin Hatch
The Honorable Lynne Woolsey
The Honorable Aurene M. Martin
The Honorable Gale Norton

FROM: Dave Lanatti

re: Federated Indians of Graton Rancheria/Rohnert Park Casino
HR2656

Page One of One

DEAR HONORABLE SENATORS, PLEASE DO NOT ALLOW A CASINO TO BE BUILT IN ROHNERT PARK. I HAVE LIVED IN THIS AREA FOR OVER 40 YEARS, AND HAVE SEEN THIS AREA GROW AND CHANGE DRAMATICALLY IN THE LAST 25 YEARS. WE DO NOT HAVE THE INFRASTRUCTURE TO ACCOMMODATE ANOTHER DRAMATIC BOOST IN OUR POPULATION, OR TO EVEN ACCOMMODATE A SMALL BOOST IN TRAFFIC. I KNOW THAT THE AMERICAN INDIANS ARE A GOOD AND PROUD PEOPLE, AND DESERVE A CHANCE TO BE PROSPEROUS, AND I THINK THERE IS A BETTER PLACE TO BUILD A CASINO. THE AREA BETWEEN FAIRFEILD AND VALLEJO IS MORE APPROPRIATE FOR MANY REASONS, ESPECIALLY FOR TRAFFIC REASONS. IF IT MUST BE IN SONOMA COUNTY, THEN IT SHOULD BE NORTH OF SANTA ROSA, WHERE TRAFFIC IS NOT AS BAD AS IT IS AROUND HERE. THE MAJORITY OF RESIDENTS OF ROHNERT PARK DO NOT WANT A CASINO HERE. THANK YOU FOR YOUR TIME. SINCERELY, MR. DAVE LANATTI. PETALUMA, CA.

RECEIVED
03 OCT 30 PM 3:29
OFFICE OF THE
EXECUTIVE SECRETARIAT

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OCT 8, 2003

262

RECEIVED
03 OCT 30 PM 12:41
OFFICE OF THE
EXECUTIVE SECRETARIAT

DEAR MS. NORTON, 695985

BEING A VERY CONCERNED PARENT LIVING IN ROHNERT PARK, I URGE YOU TO DO WHAT YOU CAN TO PREVENT ANY TYPE OF NEVADA STYLE / INDIAN GAMING CASINO IN OUR VERY OWN NEIGHBORHOOD.

YES IT WOULD / COULD PROVIDE A SOURCE OF REVENUE to the city, JUST LIKE GROWING AND Selling MARIJUANA, HOWEVER the ARE MORE APPROPRIATE METHODS FOR A RESPECTFUL COMMUNITY.

NOT IN ROHNERT PARK PLEASE.

Sincerely,

SCOTT GUSTO & FAMILY
139 FIRETHORN
R.P. CA 94928

Sunday, October 19, 2003

RE: **AGAINST THE PROPOSED CASINO IN ROHNERT PARK, CA**

To the Honorable Gail Norton:

Against the expressed will of the overwhelming majority of its citizens, Rohnert Park Mayor and City Council have negotiated with the partnership of Stations Casino, Inc. and the Federated Indians of Groton Rancheria to establish a gaming facility in Rohnert Park (RP).

The memorandum of understanding (MOU) between the City Council and the partnership is legally non-binding. Promised, but not guaranteed, money is supposed to mitigate the negative impacts to our community of a 360-acre casino development next to our city.

However, it is clear from research into how casinos have affected other communities in California that the tribes will not pay anything close, if anything at all, to the true cost of all the negative impacts on the community.

- **Casinos can legally steal the water supply from the community, driving up water costs for the citizenry and driving down the real estate values in the area.**
- **The increase in crime and traffic cause an escalation of cost of police and auto insurance to be borne by the community.**
- **Casinos have driven down property values of the residents, who cannot sell their homes for what they paid for them. Prospective buyers do not want to raise their family next to a casino, where drugs are sold and pandering of sex occurs 24/7. Ramona, CA is a prime example of how real estate prices tumbled.**
- **Since the Casino is not obliged to pay for its water and sewage, these costs must be borne by the citizenry.**
- **Studies show that 1½ jobs are lost for every gaming industry job that is created.**

Why are the city officials pandering to the Las Vegas Casinos? For Money? Please do all you can to stop the Gambling Industry takeover in Rohnert Park, California.

Sincerely,

Al Kottman
7343 Castille Ct
Rohnert Park, CA 94928

EXECUTIVE SECRETARIAT
OFFICE OF THE
03 OCT 31 PM 8:33
RECEIVED
696028

dollars in contributions from the Tribe to mitigate these impacts! And also, they have approved and signed the Memorandum of Understanding with the Tribe and Station Casinos in spite of our objections! The MOU states that "accordingly the city will agree not to oppose the Tribe's efforts" in exchange for future promises of money! The majority of the residents felt betrayed by our City Council in this breach of trust by not representing the city and our concerns and interests for which they were elected. Even the city's police and firefighters are opposed to the casino.

I would like to request please, if you would oppose this project at this location and do what you can to **deny** the approval of this adjacent land to be taken into trust by the Federal Government for the Tribe since they have no compact made yet with the State of California.

I would also like to invite you to investigate and verify these concerns. Please feel free to contact me if you would like more information. I can refer you to some significant people who, after much research, are more informed and knowledgeable than I am with solid facts in regards to this issue.

Thank you very much for your time.

Sincerely,

Wayland Lee

Wayland Lee

264

Wayland Lee
7347 Cornell Ave.
Rohnert Park
CA 94928
(707) 664-8516
compilot@earthlink.net

69598

RECEIVED
03 OCT 30 PM 12:41
OFFICE OF THE
EXECUTIVE SECRETARIAT

October 25, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240
(202) 208-7351

Dear Ms. Norton,

Hello, my name is Wayland Lee and I live in the city of Rohnert Park, California since 1979. I am writing to you personally to solicit your help.
The city of Rohnert Park is a family oriented community that has a wholesome "family friendly" atmosphere which is peaceful with family tract homes, nice parks, playgrounds, schools, and family catered community recreational activities which are ideal for raising children.
Just outside of the Rohnert Park city limits, in a large area of land of about 350 acres, the Federated Indians of the Graton Rancheria Tribe, with the financial backing of Station Casinos, Inc. of Las Vegas, Nevada, plan to build a large 300 room hotel/casino/entertainment resort complex at the very border of this city located at Stony Point Road and Wilfred Avenue.
The majority of the city's residents are alarmed at this proposed development which will threaten our way of life for many years to come.
This proposed project, if authorized to proceed to completion in close vicinity, will bring some undesirable consequences to our city.
They are:
1.) A significant increase in automobile traffic to our already congested freeways, roads, and streets, which increases the likelihood of accidents.
2.) An increase in crime, especially organized crime.
3.) Drunk driving incidents resulting from its 24 hour bar.
4.) Adverse impact on our city's limited water supplies and obligations. (Rohnert Park has limited well water supplies which the casino will have legal rights to seize.)
5.) An adverse moral image to our children and youth and the results it will bring in association with gambling.
At several open hall City Council meetings, the majority (80%) of the city's citizens vehemently opposed the project and spoke out against it to our mayor and City Council members, saying that a gambling casino has no place in this family oriented city for the reasons already mentioned.
However, the City Council did not even consider our concerns, but instead negotiated with the Tribe and Station Casinos officials in private back room "closed door" sessions without any input, comment, or vote from the public, or any impact reports for the sake of receiving millions of

130

None
Rohnert Park, California

confidential fax

To:	**Aurene M. Martin - Asst. Secretary of Indian Affairs**
Fax Number:	1-202-208-5320
From:	**Jeff Carroll**
Fax Number:	707-588-9709
Business Phone:	
Home Phone:	
Pages:	2
Date/Time:	11/3/2003 4:56:42 PM
Subject:	Indian Gaming in Rohnert Park, California

Please forward to the appropriate person for review.

Thank you.

265)

November 3, 2003

To Whom It May Concern:

I am writing to express my frustration with indian gaming and to ask for help. Recently, it was revealed to the citizen's of Rohnert Park, California that an indian tribe was moving to secure 360 acres of land on the west side of our city. It soon became obvious that despite the family oriented nature of this small Northern California city, this tribe planned on building a Las Vegas style casino/hotel/resort on this property.

I'm sure you have heard the details of the proposal but have you ever seen our city? If so, you would know that the existing infrastructure cannot support something of this size, even with "mitigation". If so, you would know that it is a family community and not one that wants the neon lights of the big city. If so, you would know that there are ranch, farm, and park land surrounding this city that lends to its beauty and peaceful nature.

I can't believe there is anybody who doesn't see that indian gaming is out of control. I know that these now wealthy tribes contribute a significant amount of money to certain politicians, but take those contributions out of the equation for a moment. Would you folks want this type of thing in your back yard? I'm sure the answer is no. You want to live in a peaceful, safe, quiet environment. If you want to gamble, you go to a gambling community. I love Disneyland but I don't want to live next door to it.

Even the people who voted in 2000 to allow indian gaming to help the tribes establish "self-reliance" didn't imagine this. Those people envisioned small gaming rooms on existing indian land, not native americans buying every empty parcel they can find to build "Caesar's Palace". I too believe in self-reliance. As a matter of fact, I am self-reliant. I have a job. In fact, the job that I have gives preferential points in the application process to people of minority, including native americans. Indian gaming has nothing to do with "self-reliance" and everything to do with a few people getting rich. This has nothing to do with the wrongs the native americans suffered centuries ago and everything to do with modern day opportunity.

We realize we have no local control over this "sovereign nation" but you do. Please help to protect the citizens of this state and establish reasonable regulations for these tribes that prevent these huge casinos from spreading like wildfire throughout California's neighborhoods.

There is a place for casinos but in small cities and communities, adjacent to our schools, homes, playgrounds, and parks is not one of them.

Sincerely,

Jeff Carroll

Jeff Carroll
Rohnert Park, CA.

10-1-03

266

SENATOR FIENSTIEN
ONE POST ST.
SUITE 2450
SAN FRANCISCO,CA. 94104

DEAR SENATOR.

THANK YOU FOR AUTHORING S. 1342. WE FEEL LOCAL INPUT ON CASINO LOCATING IS VERY IMPORTANT.

PLEASE WORK TO GET THIS BILL PASSED AS SOON AS POSSIBLE.

ALSO PLEASE KEEP US INFORMED ON THE PROGRESS OF THIS BILL.

SINCERELY YOURS,

Leona C. Asper

LEONA C. ASPER
215 ADELE AV.
ROHNERT PARK. CA. 94928

CC: LYNN WOOLSEY
GALE NORTON
ARMANDO FLORES

10-1-03 /30

RECEIVED

267

694846

03 OCT -8 AM 10:25

OFFICE OF THE
EXECUTIVE SECRETARIAT

SENATOR FIENSTIEN
ONE POST ST.
SUITE 2450
SAN FRANCISCO,CA. 94104

DEAR SENATOR.

THANK YOU FOR AUTHORING S. 1342. WE FEEL LOCAL INPUT ON CASINO LOCATING IS VERY IMPORTANT.

PLEASE WORK TO GET THIS BILL PASSED AS SOON AS POSSIBLE.

ALSO PLEASE KEEP US INFORMED ON THE PROGRESS OF THIS BILL.

SINCERELY YOURS,

Robert J. Asper

ROBERT J. ASPER
215 ADELE AV.
ROHNERT PARK. CA. 94928

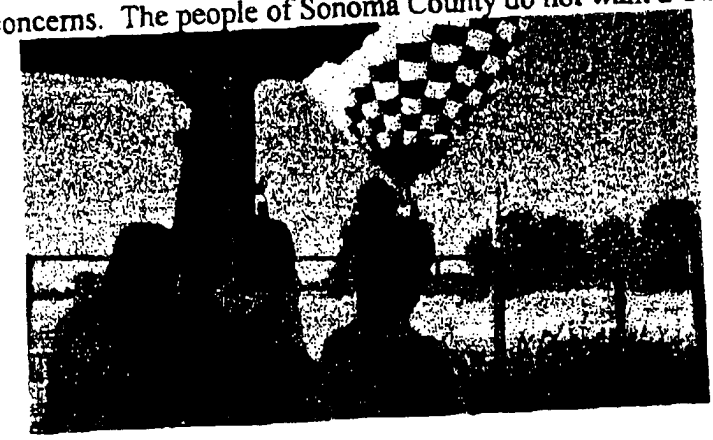
CC: LYNN WOOLSEY
GALE NORTON
ARMANDO FLORES

Dean and Coleen Bogert
3052 Mule Deer Lane
Santa Rosa, CA 95407

Gail Norton
Secretary of the Interior
1847 C Street Northwest
MS 7229
Washington DC 20240

Dear Ms. Norton,

We do not want the Graton Rancheria Casino to come to Rohnert Park. We live in Southern Santa Rosa right off of Stony Point Rd, the same road that the casino would be on. I have 6 children, and the increased crime and traffic, along with drunk driving are some of my concerns. The people of Sonoma County do not want a Casino. We live in



the suburbs that back up to open farm land. This is a picture of what is behind our back yard. The casino would be beyond the trees. That is too close to our home.

Sonoma County is a beautiful, family friendly place to live and raise a family. A casino does not belong here.

Sincerely,

Dean P Bogert
Coleen J Bogert

Dean and Coleen Bogert
707-566-9689

RECEIVED
03 OCT 14 AM 11:52
OFFICE OF THE
EXECUTIVE SECRETARIAT

694992

5400 Country Club Drive
Rohnert Park, CA 94928
October 4, 2003

Ms. Gail Norton
Secretary of the Interior
1849 C. Street Northwest, MS-4140-MIB
Washington, D.C. 200240

Dear Secretary Norton:

I am writing to you to request that you DO NOT ALLOW the Federated Indians of Graton Rancheria to obtain a Fee (or Land) to Trust from the Federal Government to purchase, with the assistance of the gambling empire of Nevada, land in Rohnert Park California to establish a gambling casino. When Senator Boxer and Congresswoman Lynn Woolsey sought permission for this tribe to reestablish itself, the tribe promised that they would not use the land for gambling purposes.

Most of us in California that voted to allow Indian tribes to re-establish themselves were led to believe that they would only be allowed to build casinos, or whatever, on individual reservations not to be allowed to do so near schools and close knit communities or anywhere they chose.

Additionally, as a 100% disabled veteran who served this nation in three wars and served for over 31 years in the U. S. Military, I am appalled by the fact that these tribes are free of having to pay local and federal taxes, while I continue to be forced to do so.

So, please do not allow another mistake to be made by not approving any request from the Graton Group to build in Rohnert Park.

Sincerely,

Robert C. Doney

ROBERT C. DONEY
Sergeant Major, U. S. Army (Retired)

Chief Seattle wrote a marvelous letter in reply. His letter expresses the moral, really, of our whole discussion.

"The President in Washington sends word that he wishes to buy our land. But how can you buy or sell the sky? The land? The idea is strange to us. If we do not own the freshness of the air and the sparkle of the water, how can you buy them?

"Every part of this earth is sacred to my people. Every shining pine needle, every sandy shore, every mist in the dark woods, every meadow, every humming insect. All are holy in the memory and experience of my people.

"We know the sap which courses through the trees as we know the blood that courses through our veins. We are part of the earth and it is part of us. The perfumed flowers are our sisters. The bear, the deer, the great eagle, these are our brothers. The rocky crests, the juices in the meadow, the body heat of the pony, and man, all belong to the same family.

"The shining water that moves in the streams and rivers is not just water, but the blood of our ancestors. If we sell you our land, you must remember that it is sacred. Each ghostly reflection in the clear waters of the lakes tells of events and memories in the life of my people. The water's murmur is the voice of my father's father.

"The rivers are our brothers. They quench our thirst. They carry our canoes and feed our children. So you must give to the rivers the kindness you would give any brother.

"If we sell you our land, remember that the air is precious to us, that the air shares its spirit with all the life it supports. The wind that gave our grandfather his first breath also receives his last sigh. The wind also gives our children the spirit of life. So if we sell you our land, you must keep it apart and sacred, as a place where man can go to taste the wind that is sweetened by the meadow flowers.

"Will you teach your children what we have taught our children? That the earth is our mother? What befalls the earth befalls all the sons of the earth.

"This we know: the earth does not belong to man, man belongs to the earth. All things are connected like the blood that unites us all. Man did not weave the web of life, he is merely a strand in it. Whatever he does to the web, he does to himself.

"One thing we know: our god is also your god. The earth is precious to him and to harm the earth is to heap contempt on its creator.

"Your destiny is a mystery to us. What will happen when the buffalo are all slaughtered? The wild horses tamed? What will happen when the secret corners of the forest are heavy with the scent of many men and the view of the ripe hills is blotted by talking wires? Where will the thicket be? Gone! Where will the eagle be? Gone! And what is it to say goodbye to the swift pony and the hunt? The end of living and the beginning of survival.

"When the last Red Man has vanished with his wilderness and his memory is only the shadow of a cloud moving across the prairie, will these shores and forests still be here? Will there be any of the spirit of my people left?

"We love this earth as a newborn loves its mother's heartbeat. So, if we sell you our land, love it as we have loved it. Care for it as we have cared for it. Hold in your mind the memory of the land as it is when you receive it. Preserve th land for the children and love it, as God loves them all.

"As we are part of the land, you too are part of the land. This earth is precious to It is also precious to you. One thing we know; there is only the one God. No man, be h Red Man or White Man, can be apart. We are brothers after all."

PROPOSED MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF ROHNERT PARK, CALIFORNIA AND THE FEDERATED INDIANS OF THE GRATON RANCHERIA

Non-Binding Preliminary Term Sheet

Parties:

The City of Rohnert Park, California (the "City") and the Federated Indians of the Graton Rancheria, a federally recognized Indian tribe (the "Tribe").

Purpose of the MOU:

The City and the Tribe intend to enter into a definitive Memorandum of Understanding (the "MOU") regarding the Tribe's commitment to mitigate the potential financial and environmental impacts of the proposed development, construction and operation of a gaming facility (the "Project") on certain property (the "Property") located adjacent to the boundaries of the City and within the unincorporated area of Sonoma County, California (the "County"). The MOU will address, among other things, the Tribe's commitment to make certain mitigation contributions and community investments to address various impacts that may arise in connection with the Project.

Recitals:

The MOU will contain the following Recitals:

(i) the Tribe's aboriginal territory includes Marin and Sonoma Counties, California;

(ii) in 1920, the United States acquired a parcel of land in Sonoma County in trust for the benefit of the Tribe which became known as the Graton Rancheria;

(iii) in 1966, the United States terminated its government-to-government relationship with the Tribe pursuant to the California Rancheria Act of 1958, and distributed to private individuals the tribal reservation lands;

(iv) in 2000, Congress restored the federal government's government-to-government relationship with the Tribe pursuant to the

990 Echo Ct.
Rohnert Park, Ca 94928

RECEIVED
03 OCT 15 AM 8:48
OFFICE OF THE
EXECUTIVE SECRETARIAT

September 8, 2003

Secretary Gale Norton:
U. S. Dept of the Interior
1849 C Street NW
Washington, D.C.

Dear Secretary Norton:

I am writing to you asking you to amend the 1-A that allows casinos to be built wherever They so desire in the name of the Tribe. I have just finished reading the proposed memorandum of understanding between the city of Rohnert Park, California and the Federated Indians of the Graton Rancheria. I find something very significant is missing and that is Stations Casino of Las Vegas who have the money.
A casino in this purposed area outside the Rohnert Park City limits is a negative and should not be built. There is lack of water especially if they have to dig 1000 feet to obtain water which may subsequently deplete the water supply of Rohnert Park, Pengrove and Sebastopol.

I can understand John Muir's sadness when Hetchy Hetchy was dammed. .Man cannot go against nature. The water supply for S.F. should and could have been where Lake Don Pedro now exists.
The native Americans had great respect for land ,water and all of creation and the paradox is that the Las Vegas casino does not.

I am enclosing a copy of the Memorandum and a copy of Chief Seattle's quote.

Thank you for your consideration to help change the existing law of 1-A and please help Rohnert Park to keep our city the friendly city with an open space plan voted on by the citizens.

Sincerely,
Eunice Edgington
(707) 588-8971

CC: Sonoma County Board of Supervisors

4222 Primrose Avenue
Santa Rosa, CA 95407

Telephone: (707) 586-5913
mervisr@aol.com

RECEIVED
SEP 17 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 6, 2003

City of Rohnert Park
6750 Commerce Boulevard
Rohnert Park, CA 95407

Dear City Council:

I am a neighbor of the proposed casino and had signed a petition against it when it was first announced. I did so in the hope that the people planning the casino would work with the neighbors to assure that its negative impact on our small farm lifestyle would not be compromised. My partner asks that I let you know he has always been in favor of the development.

My two main concerns were the wells in the area and the design of the facility itself. Now that I have read about the intent to drill to the lower aquifer, which my engineer son-in-law tells me is a viable plan if properly designed; and have heard that the design is a very classy hotel casino (which I'd like to see, but was unable to stay at the Council meeting the night it was presented), I withdraw my objection to the development. In fact, I would like to compliment the tribe for its foresight in considering these issues.

I believe that development in this particular area is going to happen regardless of what the neighbors prefer. Although a casino wouldn't be my first choice for a neighbor, it wouldn't be my last either. I am very hopeful – and am asking you by writing this letter – that the traffic issues will be handled in such a way that Primrose doesn't become a thoroughfare. It is really important to us that our pets and relative quiet be preserved.

Aside from that, I for one welcome the Federated Indians of Graton Rancheria into our community and look forward to joining them for 99 cent breakfasts!

Sincerely,

Mervis Reissig

Mervis Reissig

Ron Pruitt

Ron Pruitt

cc: Federated Indians of Graton Rancheria
Congresswoman Lynn Woolsey
Congressman Mike Thompson
U.S. Senator Dianne Feinstein
U.S. Senator Barbara Boxer
Honorable Gail Norton
Bureau of Indian Affairs
Honorable George T. Skibine
Supervisor Mike Reilly

RECEIVED
03 SEP 24 AM 9:37
OFFICE OF THE
EXECUTIVE SECRETARIAT

August 10, 2003

George W. Bush, President of the United States
Gale Norton, Secretary of the Interior
Barbara Boxer, U.S. Senator
Diane Feinstein, U. S. Senator
Lynn Woolsey, U.S. Congresswoman
Gray Davis, Governor of California
Joe Nation, State Assembly
John Burton, State Senator
Mike Kerns, Sonoma County Supervisor

593523

Dear Leaders and Representatives:
As a fifth generation Californian, a resident of Sonoma County and San Francisco, and an American citizen, I am angry about the manipulation of laws and regulations by 'rancheria' bands of Indian tribes allowed to profit from gambling, illegal in California except within these tribal 'nations'. The Federated Indians of Graton Rancheria seem unstoppable in their drive to put a gaming casino in the midst of rural open lands.

The land this casino development will be built on is environmentally sensitive, a wetlands nursery for flora and fauna of San Francisco Bay. Although many promises have been made to protect the area, tribal deals have been notoriously poorly managed and the Graton Rancheria Indians, who promised not to open a casino, have already misrepresented their intentions in order to achieve their goals at any cost. The price will be paid in degradation of irreplaceable natural attributes.

I am absolutely FOR the development and education of all of our citizens trapped in poverty. Be they Indians or members of any group, everything should be done to assist in the evolution toward self-reliance and an improved standard of living. However, gambling, and the chaos connected to it, (including the whiff of syndicate/organized crime associated with this deal), and putting our precious natural surroundings in jeopardy, is not the answer.

Further, it is disturbing to feel that nothing can be done to stop this. We seem to have no jurisdiction in our own county. Are we powerless to defend rural values from the actions of a 538-member group with special protections, not benefiting all our citizens?

If the Graton Rancheria leadership really cares about its disadvantaged members and their ancestral lands as it purports to do, a gambling casino in an ecologically vulnerable area would never be its choice.

I beg each of you: do what you can to put a stop to this inappropriate project.
Sincerely,

Perry Walker Freeman
114 Purrington Road
Petaluma, CA 94952
707-778-8140

Joe and Carolyn Pimentel
3647 Melcon Lane
Santa Rosa, Ca 95407
707-585-0245 fax: 707-588-0402

RECEIVED
03 SEP 24 PM 3:25
OFFICE OF THE
EXECUTIVE SECRETARIAT

Re: Does Anyone Care?

To Whom It May Concern:

I am writing you to ask for help! Regarding the Graton Rancheria wanting to purchase a blanket field of awesome land who's home to many birds, salamanders and wild geese. The land I am referring to is located just outside of Rohnert Park, California. I live just 3 short miles away from this virtually empty farmers paradise. Around this field lies small farm like homes, and ranches that cultivate cows, hay and Ana ray of farm industry. I am asking you to picture this in your head for a moment. Now picture a large majestic massive Casino and Motel with a huge parking lot, yes in the midst of all this wildlife freedom. Sound out of place? Many of us believe so!

My neighbors, some just across the way from this proposed massive casino site, feel infringed upon, angry, mortified, duped, sadden and shocked that our farm like pastures are now in jeopardy. From our wells running dry to wastewater disposal, from flood control issues, to massive vehicle traffic. From quiet serene with overhead geese squawking. All of this, our concerns and opinions fall on the Rohnert Park Counsel and most of the Sonoma County Supervisors deaf ears.

I talked with one neighbor who was in tears, she felt helpless and said if they widen Wilfred Avenue, (which is proposed for traffic issues) the road will be at her doorsteps. These neighbors as well as myself have lived in this southwest community for more than 10 years, some neighbors even longer. We moved to the country for peace and quiet, away from the streets of city even though the city is not far, the sounds of wildlife are all around. We exchange the smells of manure for the frogs that croak in the night, we exchange the well waters for the multiple birds that flock about from farm to farm. We exchange driving on smaller roads, and swelled culverts during the winter for peace sounds of rain hitting our windows. We exchange flooded land, for the chance to gaze out and see birds we never seen before. Now all they want us to have is noise, traffic, buildings, asphalt, and of course crime and a lot of people. We feel as though we are being pushed out, told to go away and our property and feelings mean nothing. The old mighty buck means more than all of this...

The county keeps saying their hands are tied. Please untie them. The Rohnert Park City Counsel doesn't care, they have run their books into the ground and this is their way of bailing out. Surely, there is another way. Why should the land, wildlife and people suffer because of their book keeping problems?

What is the saddest of all, is that I find myself angry and bitter towards the Indians, all of them. I feel they have taken advantage of the state and community. They don't care what they destroy as long as they enrich them selves with money. It is not right nor is it fair. Please stop this from happening, a lot depends on what you do. Please care.

Sincerely,

Carolyn Pimentel

September 22, 2003

Joseph & Eileen Perry
1122 Civic Center Drive,
Rohnert Park, CA. 94928
(707) 585-3144

Gail Norton
Secretary Of The Interior

Dear Ms. Norton,

We would like you to consider a situation in Rohnert Park California. The Federated Indians of Graton Rancheria have announced they intend to build a Casino and Hotel complex here. They are backed by Nation Casinos of Las Vegas.

This is a small family town and we bought our houses here for that reason. We also have a University in Rohnert Park with many hundreds of young people attending. As citizens we were not asked if we wanted a Casino within 2 miles of our city center and a few hundred yards from our movie theater and stores. Our city council has told us we have no voice in the matter.

The area of land in question is on the border of city limits. We voted to preserve this parcel of land as green-belt. It is enviromentally sensitive and floods in the winter. We have a water, sewer and traffic problem right now and new buildings have been strictly limited for that reason.

We are therefore asking that a land Trust NOT be granted to the Federated Indians of Graton Rancheria.

Thank you for your consideration.

Sincerely,

Joseph & Eileen Perry

Eileen V Perry

Joseph Perry

E3

Gail Norton
Secretary of Interior
1849 C Street Northwest
MS-7229
Washington D.C. 20247

Dear Ms. Norton

I am concerned about the attempt of the Graton Indian Tribe to locate a casino in Rohnert Park, Ca. They want to locate it on a flood plain behind the mobile home park my daughter lives in. When the park was first built it did not flood. As commercial building appeared around the park more flood plain was covered and flooding started. It gradually gets worse with each new addition. Now during heavy rain years when the water invades the park, residents are unable to go to work and if out of the park unable to get back home.

I also understand that the existing wells which serve Rohnert Park are depleting the underground water table faster than the water is being restored. They area the tribe wants to build on is a large aquifer that now replenishes the water table for much of the area. What will the loss of this aquifer do to future water supplies when at present we are being pushed to the brink of available water?

This does not even consider the traffic problems the casino would create on the nearby streets. One is a narrow two lane country road that floods with normal rain. The others are regular two lane roads, one of which floods anytime there is a heavy rain storm.

Please consider these important issues and do not approve this location for the casino.

Sincerely,
Charles Lilley
Santa Rosa, Ca.

Charles D. Lilley
09/09/03

ES

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03 SEP 24 AM 11:14

OFFICE OF THE
EXECUTIVE SECRETARIAT

ZK93683

Gail Norton
Secretary of Interior
1849 C Street Northwest
MS-7229
Washington D.C. 20247

Dear Ms. Norton

I am concerned about the attempt of the Graton Indian Tribe to locate a casino in Rohnert Park, Ca. They want to locate it on a flood plain behind the mobile home park my daughter lives in. When the park was first built it did not flood. As commercial building appeared around the park more flood plain was covered and flooding started. It gradually gets worse with each new addition. Now during heavy rain years when the water invades the park, residents are unable to go to work and if out of the park unable to get back home.

I also understand that the existing wells which serve Rohnert Park are depleting the underground water table faster than the water is being restored. They area the tribe wants to build on is a large aquifer that now replenishes the water table for much of the area. What will the loss of this aquifer do to future water supplies when at present we are being pushed to the brink of available water?

This does not even consider the traffic problems the casino would create on the nearby streets. One is a narrow two lane country road that floods with normal rain. The others are regular two lane roads, one of which floods anytime there is a heavy rain storm.

Please consider these important issues and do not approve this location for the casino.

Sincerely,
Karen Lilley
Santa Rosa, Ca.
Karen Lilley
Sept 10 2003

ES

277

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03 SEP 26 AM 9:46

OFFICE OF THE EXECUTIVE SECRETARIAT

September 25, 2003

693896

Gale Norton
Secretary of the Interior
1849 C Street Northwest
MS 7229
Washington D.C., 20240

RE: Graton Rancheria's Proposed Casino

I am a resident next to the property that the Graton Rancheria wants to purchase for a casino. This casino will be huge; along with the gaming area, there will be a 300-room hotel, 1500-2000 seat special events auditorium, a spa and restaurants.

I have serious concerns about this project and I'm truly hoping the Dept. of the Interior listens to what the people who will be impacted by this have to say.

The area they want is prime agricultural land and is supposed to be a greenbelt area. The Laguna De Santa Rosa waterway (which is an environmentally sensitive area) runs through the property. These fields and waterway are home to so many animals; foxes, pheasants, quail, herons, egrets, ducks, geese, and migratory birds to name a few. Not to mention the endangered Tiger Salamander. This area is also our water recharge area and should be left natural, not paved over!

The property is bordered by rural residential neighborhoods. This casino will be right in the midst of our neighborhood and will take away the reason we live out here! It is predicted that there will be several thousand people coming to this casino a day! The traffic will be horrible! The very lightly traveled road that I live on will undoubtedly become busy as one of the entrances/exits of this casino will come out onto my road. How many drunks are going to decide to take a ride in the country before heading home?

The City of Rohnert Park is not providing the Rancheria with water or sewer. This is a major concern to me as water is already at a premium here. The City of Rohnert Park is also on a well and pumps so much water it has lowered our water table. The Rancheria is planning on drilling wells at least 1,000 feet deep that can pump 2700-3500 gallons a minute. We are all on shallow wells in this area and I am very worried that we will go dry. Who will help us? Will the Rancheria? No. We'll have to find a way to come up with the thousand of dollars it costs to have a new well dug. While the cause of our dry wells will be raking in millions of dollars.

I have lived out in this area for 13 years and have always felt safe. The only crime out here is once in awhile someone's pig gets stolen. Now I'll be wondering when I'm gone if my home is safe from burglars. Statistics have shown us that crime increases in areas that have casinos!

This is Las Vegas gambling (Station Casinos) using the tribe's name in order to make a profit. Our local politicians won't listen to the thousands of Rohnert Park residents and unincorporated residents who are very upset and against this. They only see the millions and millions of dollars that Station Casino is promising them. They don't seem to care about the impact of this project on the area. Please don't let Las Vegas and all the trouble it brings into our neighborhood. Is it so discouraging to see how lots of money can buy anything.

Please take into consideration the average folks who live out here, working hard so we can improve our homes and lives. Our quiet rural living is going to be gone if this huge casino goes in. Please ask yourself this; Would you want a casino down the road from your house? I can't imagine you would. Please don't let it happen out here. Please don't grant a Trust to the Federated Indians of the Graton Rancheria for this project.

Respectfully submitted,

Lisa Waite

Lisa Waite
4327 Primrose Avenue
Santa Rosa, CA 95407
707-585-1870
email: lwranch@pcweb.net

Secondly, during the rainy season, this land, and the surrounding areas, are prone to extensive flooding. Main roads, residential properties, and fields are completely under water. On a good rainy day, the flood control channel overflows it's banks in a matter of hours. Should this 360 acres be built on, where will the water go? It has no place to go but our homes. The consequences could be catastrophic. These issues are not being addressed in the media, or by our local governments. We live out here year round, we know what happens. I **implore** you, please help us find a better place for this casino (or any proposed development on this property for that matter).

The Federated Indians of Graton Rancheria have purchased 2,000 acres of land near Sears Point, California. Initially, this is where they wanted to build their project. We feel that this 2,000 acre parcel would be a much more appropriate area for such a development. It's right off the freeway (easy access, no roads to deal with), it's centrally located, it's not in the middle of a residential neighborhood, they could actually build tribal housing as well as a casino, and if there are environmental issues to mitigate, it would be far easier to do this on a 2,000 acre parcel than on 360 acres. The Sears Point site just makes more sense.

I know this project is probably one of thousands you need to consider, and I know it's difficult, if not impossible, to make everyone happy. I'm not trying to shut down the Federated Indians of Graton Rancheria, I'm trying to help save my neighborhood. Please help us.

Thank you for your time,

Pamela A. Miller
4306 Primrose Ave.
Santa Rosa, CA 95407

278

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03 SEP 26 AM 9:46

OFFICE OF THE
EXECUTIVE SECRETARIAT

9/25/03

693895

Gail Norton
Secretary of the Interior
Department of the Interior

Re: Proposed casino near Rohnert Park, California

Dear Gail Norton,

I am writing in regards to the proposed casino near Rohnert Park, California. I live one block away from the site, in southwest Santa Rosa. I have lived in this residential neighborhood for 20 years. While I am **not** against Indian casinos, I am extremely concerned about the proposed location for this project planned by the Federated Indians of Graton Rancheria. While the media and our local politicians refer to this piece of property as simply "land in an unincorporated" section of the county, the people who live on or near it will tell you a different story.

This piece of property (approximately 360 acres), is a designated community separator, a flood plain, vernal pool area, flood control channel, aquifer recharge area, a residential neighborhood, and home to several different species of plants and animals, some endangered (California Tiger Salamander, San Francisco Garter Snake, Sebastopol Meadowfoam, etc.), to name a few. The immediate surrounding residential neighborhood is comprised of hundreds of people who have all lived out here for years.

Other than the usual issues I have about a casino being located in the middle of a residential neighborhood (existing inability to support additional traffic, crime, noise, etc.), as well as the fact that the proposed casino entrance empties out directly onto my small, one lane street, I have some very serious concerns that I will outline as follows: This 360 acre property is located directly over our main aquifer "recharge" area. This aquifer serves residential water wells in Santa Rosa, Cotati, Penngrove, Rohnert Park, and some parts of Sebastopol. The property also has a large flood control channel running through it. This recharge area is vital to the thousands of people who depend on well water. Currently, we are in serious "overdraft" of our water supplies due to the amount of water that is being drawn from the aquifer by the city of Rohnert Park. Should this land be developed (i.e. paved or built on), the rain water will not be able to penetrate through to replenish the aquifer, and our wells will go dry. We have no recourse should this happen. Most people don't have an extra $15,000.00 to drill a new well. Additionally, this casino has plans to drill two 1,000 foot wells to provide water to the casino, restaurant, hotel, etc. This will further deplete the already endangered water supply.

279

130

Pipedreams Plumbing
Quality Craftsmanship at Reasonable Rates
3200 Dutton Ave. #324
Santa Rosa, Ca. 95407

Stephen C. Smith
License #578516
(707) 523-1315

RECEIVED
SEP 22 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Aurene M. Martin
Assistant Secretary Indian Affairs
US Department of The Interior
1849 C St. Northwest
MS-414-MIB
Washington D.C. 20240
FAX202-208-5320

To Whom It May Concern:

I am a resident of Rohnert Park and would like to express my strong objection to the proposed Indian gaming casino. There are many reasons that the Federated Indians Of Graton Rancheria should not be allowed to build a casino in Rohnert Park. Among them; concerns about the effect on the water supply, increased traffic, increased crime, negative effect on local businesses, and more.

I understand also that the tribes have a tax exempt status yet would benefit from public services such as police and fire protection, which are paid for with tax dollars.

It is my belief that I am with the majority of residents of Rohnert Park in being against having a casino in our community. I urge you to consider this in exercising your influence on this situation.

Sincerely,

Stephen C. Smith

ES

280)

My name is (Print) Laisha J. Beeson

I live at 122 Hill Blvd. Rohnert Park, Ca 94928

My telephone # is 707-762-1902

RECEIVED
03 SEP 26 AM 9:46
OFFICE OF THE
EXECUTIVE SECRETARIAT

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Laisha J. Beeson Date 9/8/03

65

2810

My name is (Print) John Beeson

I live at 122 Hill 693902 Petaluma, CA 94952

My telephone # is 707-762-1902

RECEIVED
03 SEP 26 AM 9:46
OFFICE OF THE
EXECUTIVE SECRETARIAT

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature John Beeson Date 9-8-03

(5) 282

RECEIVED

03 SEP 26 AM 9:46

OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) Anne Julene Beeson

I live at 122 Hill Blvd Petaluma Ca 94952

My telephone # is (707) 765-0621

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature A. Julene Beeson Date 9-8-03

340

FACSIMILE TRANSMISSION SHEET

To: Aurene Martin

From: Janet Ruiz

~~Company:~~ US Dept of Interior

Date: 9/10/03

Fax Number:

# of pages including cover: 2

Phone Number:

Sender's Reference Number: (707)584-3430

CC: President Bush, Vice President Cheney, Secretary Gail Norton

Re:

Your Reference Number:

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Thank you for considering our situation!

Janet Ruiz
concerned citizen

RECEIVED
03 SEP 11 AM 11:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

592962

September 10, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department of the Interior
1849 C Street Northwest
Washington D.C.

Dear Ms Martin,

Please consider our request to withhold the granting of a Trust to the Federated Indians of Graton Ranchereia in Sonoma County, California. They are asking for land in Rohnert Park, CA to build a casino.

The people of Rohnert Park are opposed to the building of a casino on this property for the following reasons:

1. There is not enough water to sustain this large complex that they are proposing. Geological studies have shown that the water table is rapidly dropping due to over consumption that is occurring today. Water is being pumped out at roughly 2.5 times the rate it is being replaced by natural means. (Rohnert Park Environmental Impact Report SCH No. 99062114).

2. A Traffic study has not been done. Highway 101 is overcrowded all day and on weekends already and could not handle increased traffic to the casino. Station Casinos does not have concrete plans to widen the road, only promises to help. The traffic outside Cache Creek casino in Yolo County has increased by 87%. (Time Magazine, Dec 23, 2002 Caltrans study).

3. The Police and Firefighters are opposed to it because they do not have the resources to support the needs that this large complex will create. This is a small town of 42,000 which was developed as a bedroom community to Santa Rosa and does not have the capacity, workforce, etc to support a casino and resort.

Thank you for considering these issues as you make your decision.

Sincerely,

Janet Ruiz

Janet Ruiz
1563 Gary Court
Rohnert Park, CA 94928

Cc: President Bush, Vice President Cheney, and Secretary of the Interior Gail Norton

ES

284 —

RECEIVED

03 SEP 26 AM 9:46

OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) Jim Dreaver

I live at 553 Nortee St Sebastopol CA 95472

My telephone # is 707 823 1640

693898

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 9-14-03

285

RECEIVED

03 SEP 26 AM 9:46

OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) Chandell Beeson

I live at 122 Hill Blvd Petaluma 94952

My telephone # is (707) 765-0621

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Chandell Beeson Date Sep 8, 03

FROM : Robert O'Neill

286

My name is (Print) Linda Pericolaes

I live at 4968 Snark Ave

My telephone # is 69371 539-8632

RECEIVED
03 SEP 24 PM 3:25
OFFICE OF THE
EXECUTIVE SECRETARIAT

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Sincerely,

Signature Linda Pericolaes Date 9/21/02

FROM : Robert Linder

BS

287)

My name is (Print) Laura Colgate

I live at 6533 Sonoma Hwy Santa Rosa CA 95409

My telephone # is 707-538-2604

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Laura Colgate

Date 9/22/03

RECEIVED
03 SEP 24 PM 3:25
OFFICE OF THE
EXECUTIVE SECRETARIAT

6937 12

FROM : Robert O'Dell

288

RECEIVED

My name is (Print) Ty Visscher

I live at 6333 Sonoma ~~698744~~ SR CA 03 SEP 24 PM 3:25

My telephone # is 707 538-2604.

OFFICE OF THE EXECUTIVE SECRETARIAT

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Sincerely,

Signature _____ Date 9/23/03

FROM : Robert O'Dell

ES

289

My name is (Print) Mike Perialakes

I live at 4968 Sunset Ave, Rohnert Park, CA 95409-3562

My telephone # is (707) 539-8632

RECEIVED
03 SEP 24 PM 3:25
OFFICE OF THE EXECUTIVE SECRETARIAT

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Sincerely,

Signature _____ Date 9/21/03

FROM : Robert Udall

ES

290

RECEIVED

03 SEP 26 AM 9:46

OFFICE OF THE EXECUTIVE SECRETARIAT

My name is (Print) DEBORAH UDALL

I live at 1355 Mauldin Way

My telephone # is 707-575-8102

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Deborah Udall Date 9/12/03

ES

291

RECEIVED

03 SEP 17 PM 2:58

OFFICE OF THE
EXECUTIVE SECRETARIAT

Pipedreams Plumbing
Quality Craftsmanship at Reasonable Rates
3200 Dutton Ave. #324
Santa Rosa, Ca. 95407

593405

Stephen C. Smith
License #578516
(707) 523-1315

Gail Norton
Secretary of The Interior
1849 C. St. Northwest
MS 7229
Washington D.C. 20240
FAX 202-208-6956

To Whom It May Concern:

I am a resident of Rohnert Park and would like to express my strong objection to the proposed Indian gaming casino. There are many reasons that the Federated Indians Of Graton Rancheria should not be allowed to build a casino in Rohnert Park. Among them; concerns about the effect on the water supply, increased traffic, increased crime, negative effect on local businesses, and more.

I understand also that the tribes have a tax exempt status yet would benefit from public services such as police and fire protection, which are paid for with tax dollars.

It is my belief that I am with the majority of residents of Rohnert Park in being against having a casino in our community. I urge you to consider this in exercising your influence on this situation.

Sincerely,

Stephen C. Smith

RECEIVED

03 SEP 24 AM 11:37

OFFICE OF THE
EXECUTIVE SECRETARIAT

693698

September 23, 2003

Gail Norton
Secretary of the Interior
1849 C Street Northwest
MS 7229
Washington, D.C. 20240

Dear Secretary Norton:

I am writing to tell you of my opposition to the proposed casino to be built by the Graton Rancheria tribe in Rohnert Park, California. The location proposed in Sonoma County, just outside the city limits of Rohnert Park is absolutely the wrong place to locate a casino.

This is a rural part of Sonoma County, accessed by two lane roads and highways that will not withstand the increased amount of traffic. A large part of the traffic brought about by such a project would end up going through neighboring communities, such as Cotati, Sebastopol, and Santa Rosa. The amount of water needed for this size of a development will negatively impact all the communities in Sonoma County, and especially those property owners who are have their own water wells. Additionally, a casino will negatively impact the local businesses especially in Cotati, Rohnert Park, and Santa Rosa, drawing much needed revenue away from locally owned shops, restaurants, and lodging in the area.

I urge you to **not** grant a Trust to the Federated Indians of Graton Rancheria for the designated land just outside of Rohnert Park. This land is not part of any Indian reservation and is not appropriate to be acquired for such purposes. Please do all that you can to make sure that this casino is not built here.

Sincerely,

Suzanne Whipple

Suzanne Whipple
8709 Dorfman Dr.
Cotati, CA 94931

September 23, 2003

RECEIVED
03 SEP 24 AM 11:37
OFFICE OF THE
EXECUTIVE SECRETARIAT

Gail Norton
The Secretary of Interior
1849 C North West
MS 7229
Washington, DC 20240

693699

Fax 202-208-6956

Dear Secretary Norton,

I am a resident of Rohnert Park and I am vehemently opposed to a casino being located adjacent to our family oriented community. We have been ignored by our City Council who can only see dollar signs and are willing to sell out our community for a proposed Casino-Hotel project. They are looking at a short term solution to the budget deficit. What they apparently are unable to comprehend are the long term problems a project like this will bring to our community.

I have been a resident of Rohnert Park for 19 years. My husband and I raised our children here and we now have grandchildren being raised here. Although I vote in every election and pay my taxes I don't feel my views or those of the citizens of Rohnert Park are being heard.

Yes, I voted for Prop 1A, because I thought the casinos would be built on land that already had reservation status. I was not aware that new tribes would be recognized and that those tribes would be allowed to purchase land wherever they pleased and build a casino. Once again we see legislation that initially was meant to accomplish something good turned around on the voter because of unintended consequences. We need to repeal Prop 1A.

The area adjacent to Rohnert Park, site of the proposed Casino-Hotel, does not have sufficient water and is environmentally fragile. The sewage processing capability in Sonoma County is limited. The area is home to the endangered California Tiger Salamander. This project would be devastating to the environment.

We already have a horrendous traffic problem on Hwy 101 as well as our major city streets. I can assure any mitigation factors that will be proposed in regard to traffic will not be adequate to alleviate the problems that would be created.

I urge you to support the residents of Rohnert Park and the surrounding communities and oppose the Casino-Hotel project. I also urge you to work to repeal Prop 1A. In addition legislation in Washington must be tightened up to prevent these "special interest groups" masquerading as "sovereign nations" from circumventing laws that the rest of us are subject to.

Thank you for your time and consideration.

Best Regards,

Roxanne Meuse
8764 Laurelwood Drive
Rohnert Park, CA 94928
707-792-1446

RECEIVED
03 SEP 24 AM 11:37
OFFICE OF THE
EXECUTIVE SECRETARIAT

I write a plea for help regarding the Proposed Graton Rancheria tribe's 683700 casino to be in my city of Rohnert Park, CA. I am a mother of two, as well as a first home buyer. I greatly value our slower paced, safe community.

The projected problems with a casino in Rohnert Park deeply disturbs me. To list a few;

1. Increased traffic on 101 - we have 2 lanes, and it is already very conjested.
2. Water supply - we can't meet the demands of our own citizens now. (See Rohnert Park Environmental Impact Report SCH No. 99062114).
3. CRIME RATE INCREASE. This will affect my children as well as the value of our property. Casino cities have 87% higher crime rate than the national average, says US News and World reports.
4. Harmful to the local economy. The casino will remove money from local businesses.
5. The Graton Tribe will not be required to abide by state or local regulations. They pay no taxes to the city or state, but we are required by law to provide fire and police protection.

Please, Do Not Grant a Trust to the Federated Indians of Graton Rancheria! The will of our citizens (95% of Rohnert Park residents) is not being represented by our local politicians. Help!

Thankyou for your attention,

Kimberly Musgrove
766 Santa Alicia Dr.
Rohnert Park, CA 94928

295)

My name is (Print) Sandi S Bonner

I live at 305 Lincoln Ave., Cotati CA 94928

My telephone # is 707-664-9135

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature Sandi S Bonner Date 9-28-03

RECEIVED
OCT 3
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESOURCES MANAGEMENT

My name is (Print) DAVE DAVINI

I live at 7729 Melody Dr Rohnert Park

My telephone # is 707-795-0456

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Dave Davini Date 9-28-03

RECEIVED OCT 3

150

310

My name is (Print) NORMA DEPUCCI

I live at 74 GILBERT WAY/MACOMATI

My telephone # is 707 795-4978.

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Norma J DePucci Date 9/29/03

RECEIVED
OCT 3 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESPONSIBILITY

297

My name is (Print) NORMA DEPUCCI

I live at 74 GILBERT WAY/CALCOTAGI

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Sincerely,

Signature Norma J DePucci Date 9/29/03

My name is (Print) EVA FRIAS

I live at 932 ELLEN ST. Rohner Park

My telephone # is (707) 586-7933

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Eva Frias Date 9-28-03

130

299

My name is (Print) Jim GERRANS

I live at 782 - Mill brae AVE

My telephone # is 707 586 3757

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jim + Gerrans Date 9-28-03

RECEIVED
OCT 3
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESOURCES MANAGEMENT

300

My name is (Print) IBRAHIM HAJAWI

I live at 305 MECHAM RD PETALUMA CA 94952

My telephone # is (707) 792-1542

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 9.28.03

RECEIVED
OCT 3
OFFICE

301

My name is (Print) Dana Hall

I live at 725 Racquet Club Circle Rohnert Park, CA

My telephone # is (707) 585-9545

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Dana Hall Date 9-28-03

My name is (Print) Lauren Hall

I live at 725 Racquet Circle Rohnert Park CA

My telephone # is (707) 585-9545

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Sincerely,

Signature Lauren Hall Date 9-28-03

303

My name is (Print) Alice ~~Harris~~ Harris

I live at 742 Bonnie Ave · RP

My telephone # is 795-0835

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Sincerely,

Signature [signature] Date 9/27/03

304

My name is (Print) Stephen Hazard

I live at 4915 Hessel Rd Sebastopol CA 95472

My telephone # is 707 - 823 - 8168

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 9/28/03

My name is (Print) Heather Hazard

I live at 4915 Hessel Road Sebastopol CA. 95472

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Sincerely,

Signature Heather Hazard Date 9/28/03

My name is (Print) Albert Hutchings

I live at 4949 Snyder Ln. #136 Rohnert Park, Ca 94928

My telephone # is 707-585-9376

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Albert Hutchings Date 9/28/03

My name is (Print) CRISTINA Ionescu

I live at 6081 Evelyn Ave. Rohnert Park CA 94928

My telephone # is 707 584-0591

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Cristina Ionescu Date 9/28/03

308

My name is (Print) Mary Jacob

I live at 925-A Kirsten Ct Rohnert Park CA

My telephone # is 707- 585-8535

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Sincerely,

Signature Mary Jacob Date 09/28/03

RECEIVED OCT 3

My name is (Print) Neal Leitch

I live at 1509 Madison ave Rohnert Park CA

My telephone # is 707 793-8486 94928

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 9-28-03

My name is (Print) DEAN MILLS

I live at 300 ENTERPRISE DR APT 107

My telephone # is 707-585-8843

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Dean Mills Date 9-28-03

My name is (Print) LAURA ROSENTHAL

I live at 1505 SARKESIAN DR. PETALUMA

My telephone # is (707) 762-4130

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Laura J Rosenthal Date 9/28/03

My name is (Print) Micheleen Sanz

I live at 446 Alta Ave

My telephone # is 664-0643

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature Micheleen Sanz Date 9/28/03

My name is (Print) BRIDGET WRIGHT SCHNEIDER

I live at 1542 GARFIELD CT ROHNERT PARK CA

My telephone # is 707-206-0245

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Bridget Wright Schneider Date 9/28/03

RECEIVED
OCT 3
OFFICE

314

My name is (Print) Anthony R. Sciortino

I live at 7817 Montero Dr.

My telephone # is 707-792-4465

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

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Sincerely,

Signature Anthony R. Sciortino Date 9-29-03

OCT 3

315

My name is (Print) Pamela White

I live at 7466 Bernice Ave RP Ca 94928

My telephone # is 707-664-1823

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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Sincerely,

Signature Pamela D White Date 9/28/03

My name is (Print) Amy Christensen
I live at 579 Lorraine Ct. Rohnert Park 94928
My telephone # is 707-664-8913

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature _____ Date 9/9/03

RECEIVED
SEP
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRIBAL SERVICES

Gale Norton
Secretary of the
Interior
(202) - 208 - 6956

317

10/10/03

Dear Ms. Norton:

I am writing to you to express my opposition to building of a Casino in Rohnert Park, California, by the Graton Rancheria. Their request for recognition was based on a deception, namely, that they were only interested in certification as a tribe and not interested in building a Casino.

I believe they should be held accountable for their lie and not be rewarded for it. I know for a fact that that is what would happen to me were I to lie on an application.

Sincerely:

Anthony A. Errichetti, M.D.
(707) 584-5555

RECEIVED
03 OCT 14 PM 2:13
OFFICE OF THE
EXECUTIVE SECRETARIAT

JAMES F. GERRANS
[illegible] MUIRAE AVE
SANTA ROSA, CA 95407
Home Phone 707-586-3757

RECEIVED
03 OCT 9 AM 8:15
OFFICE OF THE
EXECUTIVE SECRETARIAT

318

694887

October 01, 2003

HONORABLE GAIL NORTON
SECRETARY OF THE INTERIOR
DEPTMENT OF THE INTERIOR
WASHINGTON, D.C. 20204

THE FEDERATED INDIANS OF THE GRATON RANCHERIA.

DEAR GAIL NORTON,

I AM WRITING TO YOU WITH GREAT CONCERN ABOUT THE GRATON INDIANS WANTING TO PURCHASE LAND NEAR ROHNERT PARK CA. FOR A CASINO AND 300 ROOM HOTEL, I LIVE WITHIN A CITY BLOCK OF THIS SITE AND EVERY ONE IN THE AREA IS QUITE CONCERNED ABOUT THE GROUND WATER SUPPLY. A PROJECT OF THIS SIZE WOULD USE IN EXCESS OF 1 MILLION GALLONS OF WATER A DAY THIS COULD LOWER THE WATER TABLE CONSIDERABLY COSTING HUNDREDS OF HOMES IN THE AREA TO DIG DEEPER WELLS AT $50.00 DOLLARS A FOOT 400 FT WELL APPROXIMATELY $20,000. MANY PEOPLE IN THE AREA ARE RETIRED LIKE MY SELF AND COULD NOT AFFORD THIS. PLEASE HAVE THE GRATON INDIANS FIND A BETTER LOCATION.

THANK YOU JAMES GERRANS

James F. Gerrans

319

BETTY ANNE GOULD

704 Brett Avenue • Rohnert Park, CA 94928 • (707) 792-1573

RECEIVED

694858

03 OCT -8 PM 2:55

OFFICE OF THE
EXECUTIVE SECRETARIAT

September 25, 2003

Gale Norton
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW MS7229
Washington, DC 20240

Dear Ms. Norton:

This letter is written to voice my strong opposition to the Graton Rancheria Indian tribe acquiring the rights to build a casino and hotel complex in the city of Rohnert Park. The Rancheria is financed by Station Casinos of Las Vegas. This is not their tribal land.

This deal is not supported by the residents of Rohnert Park. Rohnert Park is a family-oriented community and its design, amenities, and neighborhoods reflect this.

The thought of a casino in this residential community is outrageous. Please take action to stop the advancement of this plan immediately.

Sincerely,

Betty Anne Gould

RECEIVED

03 OCT -7 PM 12:54

OFFICE OF THE
EXECUTIVE SECRETARIAT

694662

(320)

Thursday, September 11, 2003

RE: **NO CASINO IN ROHNERT PARK, CA**

MS. GAIL NORTON, SECRETARY OF THE INTERIOR:

I AM NOT AGAINST INDIANS. I AM NOT AGAINST CASINO OPERATORS. I AM NOT AGAINST GAMING OR GAMBLING).

PERHAPS THE STATE OF CALIFORNIA SHOULD REPEAL ALL LAWS THAT RESTRICT GAMBLING IN CALIFORNIA AND COLLECT TAXES ON THEIR PROFITS. THIS WOULD SOLVE THE BUDGET CRISIS IN SACRAMENTO.

MY OPPOSITION TO THE CASINO IS BASED ON THE EROSION OF OUR RIGHTS AS CITIZENS BEING SUBROGATED TO THE IMPOSITION OF A SOVEREIGN NATION IN OUR COMMUNITY.

IT IS UNCONSTITUTIONAL TO CREATE A SPECIAL, PRIVELGED CLASS IN OUR COMMUNITY THAT PAYS NO TAXES AND DOES NOT ABIDE THE LAWS OF OUR COMMUNITY. WHILE WE THE UNDERCLASS MUST PAY TAXES AND MUST ABIDE BY THE LAWS. THEY WILL TELL US WE ARE LUCKY TO HAVE MINIMUM WAGE JOBS IN THE CASINO.

THE WHOLE IDEA PUTTING A SOVEREGIN STATE IN OUR COMMUNITY IS A CRACKPOT IDEA. THE POLITICIANS AT ALL LEVELS WHO ALLOW THIS CHOOSE TO UNDERMINE OUR RIGHTS AS CITIZENS AND IS IN VIOLATION OF THE US CONSTITUTION.

THE LAW SHOULD RECOGNIZE THAT WE ARE ALL AMERICANS. WE BELIEVE ALL MEN ARE CREATED EQUAL AND SHOULD BE TREATED AS SUCH.

LAWS THAT SAY SOME ARE MORE EQUAL THAN OTHERS (THEY CAN CREATE SOVEREIGN NATIONS, WE CANNOT) IS UNCONSTITUTIONAL.

RESPECTFULLY YOURS.

Alfred J Kottman
7343 Castille Ct
Rohnert Park CA 94928

03 SEP 30 AM 9:02
RECEIVED
OFFICE OF THE EXECUTIVE SECRETARIAT

69142

321)

September 30, 2003

Senator Diane Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

Dear Senator Feinstein:

Thank you for authoring S. 1342, amendment to the Graton Rancheria Restoration Act. As 20 ½ year residents of Rohnert Park, we are extremely concerned about the plans underway for the Graton Rancheria to build and operate a casino on the borders of Rohnert Park. Our concerns about the use of this land are numerous – philosophically, it does not belong in the family oriented community most residents here moved to. Additionally, we fear the negative and irreversible effects on our already congested traffic, strained water and energy resources, crime, the environment and the property values.

As you may have read, our city council has been negotiating and supporting this project despite an overwhelming protest by most of it's city residents, and is doing so in a steamroller fashion, surely trying to seal the deal prior to this bill passing. We urge you to get this bill passed as soon as possible and welcome any other help you can give us in fighting this misplaced casino project.

Please keep us posted on the progress of the bill.

Sincerely,

Jeanine Lively Jonathan Lively

Jeanine Lively Jonathan Lively
957 Helene Court
Rohnert Park, CA 94928
707-585-7818

jlively@pacbell.net

cc: Congresswoman Lynn Woolsey
Secretary Gale Norton
Mayor Armando Flores

RECEIVED
OFFICE OF THE EXECUTIVE SECRETARY
03 OCT -7 AM 9:28
694581

130

322

October 15, 2003

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C., 20240
FAX 202-208-5320

Dear Ms. Martin:

I am writing again to implore you to do everything in your power to squelch the building of a casino by the Federated Indians of Graton Rancheria in our small, family oriented community of Rohnert Park, CA. Our city officials are not responding to our sentiment. You have heard the reasons from our community – traffic, irreversible impact on the flavor our friendly city, our children and families, our senior citizens, DUI's, economic drain of resources, environment, etc. The bottom line, this casino does not belong here, it is TOO CLOSE to our homes and will greatly impact our lives, not to mention it's in the middle of some beautiful farmland that people chose to live on for obvious reasons. Please do everything in your power to force either a change of location to a more appropriate and less congested place, or a change of venture. NO casino. This is not a racial issue, it is about the type of venture – one which draws 7,000 to 10,000 daily (as per Lesley Pittman, a vice president of Station Casinos) and lures people into losing their money. It's not a destination for us, it's in our faces and no good can come of it for those of us who live here.

Thank you for your diligence in pursuing this urgent matter.

Jeanine Lively

Jeanine Lively
957 Helene Court
Rohnert Park, CA 94928
707-585-7818

323

Senator Diane Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

694856

RECEIVED
03 OCT -8 PM 2:55
OFFICE OF THE
EXECUTIVE SECRETARIAT

September 30, 2003

Dear Ms. Feinstein:

As residents of the City of Rohnert Park for the past 14 years, we are very disturbed at the thought of a casino in our neighborhood. The proliferation and success of Indian gambling throughout the state is perhaps a sign of the stressful economic times, however in our view, it is a dreadful way for a community to raise revenue to fund critical local projects. Although we do understand that historically the Native American population has not been treated in a fair and judicious fashion, allowing large-scale casinos and gambling to be placed throughout the State of California with little concern for their impact, just is not in keeping with what we believe this state represents.

We thank you for authoring Senate Bill 1342 and fully support the process that would allow local communities to have input into the placement of casinos. Quite frankly, we believe that the City of Rohnert Park would be quite viable even without the financial windfall of a casino being located within our sphere. It's a shame that the community has to solicit so much commercial business to keep it financially stable, however a casino would produce more traffic, more crime and diminish the quality of life, which was our initial reason for moving to this County. We are hopeful that you will do all within your power to get this bill passed and signed into law as quickly as possible.

We would appreciate any update as to the progress of the bill. And we are hopeful that this present dismal economic situation will not promote the proliferation of gambling as a means of resolving local financial crises.

Sincerely,

Gwendolyn R Baert

Gwendolyn Baert and Randy Martz

C Congresswoman Lynn Woolsey, 1101 College Ave., Ste 200, Santa Rosa, CA 95404
Secretary Gale Norton, Department of the Interior, 1849 C Street, NW, Washington, DC 20240
Mayor Armando Flores, Rohnert Park City Hall, 6750 Commerce Blvd, Rohnert Park, CA 94928

RECEIVED
03 OCT -7 AM 9:28
OFFICE OF THE
EXECUTIVE SECRETARIAT

694578

324

Kelly McMurray
6891 San Francisco Court
Rohnert Park, CA 94928
(707) 584-3823

694895

RECEIVED
03 OCT -9 AM 8:15
OFFICE OF THE
EXECUTIVE SECRETARIAT

October 1, 2003

Senator Diane Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

RE: Graton Rancheria Casino, Rohnert Park - CA

Dear Senator Feinstein,

This evening I was approached by a Sonoma County Conservation Action field representative who gave me a pamphlet with your address so that I could write to you in order to express my feelings toward the proposed Graton Rancheria Casino in Rohnert Park, CA.

Rohnert Park and Sonoma County, in general, have been dealing with both traffic congestion problems as well as economic issues, for quite some time. I feel very disappointed as to the suggested location for this casino. The area that is proposed has already been suffering tremendously from traffic congestion, which brings the ill side effects of traffic accidents and violations. I am not clear how additional traffic of 60-70,000 visitors to the casino will be safely accommodated. On a daily basis, I am not feeling comfortable with the fact that those daily commuters will have to extend their work days, away from family and home, even longer each day for the profit of this endeavor.

As for the economic issues, Sonoma County has been dealing with severe economic issues. The Corporate environment has endured a massive reduction in work force, leaving families with new life roadblocks to overcome. Money is certainly an issue, it's not a luxury but a necessity. There have been a number of smaller non-corporate businesses that have totally closed down, leaving individuals without employment and a means to support their families. The casino environment entices

(325)

RECEIVED
03 OCT -9 AM 10: 29
OFFICE OF THE
EXECUTIVE SECRETARIAT

October 2, 2003

694909

Gail Norton
Secretary of Interior
1849 C Street Northwest
MS 7229
Washington D.C., 20240

Dear Ms. Gail Norton:

I am writing to you regarding the enormous, Las Vegas style Indian Casino proposed in Rohnert Park, California. I know the proposed 360 acre site well and have walked it through many seasons. This site is not an Indian reservation but the Federated Indians of the Graton Rancheria have an option to purchase this property because they are a "homeless" tribe. This parcel is the home to a vast array of wildlife. This site is a wetland in an agricultural area and the Laguna de Santa Rosa runs through it. I have seen egrets, blue heron, wild ducks and even river otter on this site. This is not just a vacant piece of property but a very **special habitat**. This is the wrong location for this large casino with 2,000 slots and a 300 room hotel. I urge you to ask the Federated Indians of the Graton Rancheria to pick another spot for this large project where it will not have such a negative impact environmentally.

Also at issue is the overdraft of groundwater resources beneath Rohnert Park. The Federated Indians of the Graton Rancheria will have "super water rights" due to their status as a sovereign nation. I live in an area that could be affected by water shortages due to the casino's development and the deep wells they plan to drill. Neighboring wells are in danger of running dry if this casino is built. A CASINO DOES NOT BELONG IN THIS ESTABLISHED AGRICULTURAL COMMUNITY.

Sincerely,

Kim Meister
4391 Hessel Rd.
Sebastopol, Ca 95472

RECEIVED
OCT 9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

October 2, 2003

Aurene M. Martin
Assistant Secretary Indian Affairs
US Department of the Interior
1849 C street Northwest
MS-414-MIB
Washington D.C., 20240

Dear Ms. Martin:

I am writing to you regarding the proposed Indian Casino in Rohnert Park, California. I know the proposed 360 acre site well and have walked it through many seasons. This parcel is the home to a vast array of wildlife. This site is a wetland in an agricultural area and the Laguna de Santa Rosa runs through it. I have seen egrets, blue heron, wild ducks and even river otter on this site. This is not just a vacant piece of property but a very **special habitat**. This is the wrong location for a casino. I urge you to ask the Federated Indians of the Graton Rancheria to pick another spot for this large project where it will not have such a negative impact environmentally.

Also at issue is the overdraft of groundwater resources beneath Rohnert Park. I live in an area that could be affected by water shortages due to the casino's development and the deep wells they plan to drill. The neighboring wells are in danger of running dry if this casino is built. IN GOOD CONSCIENCE THIS LAND CANNOT BE DEVELOPED. THIS IS THE WRONG LOCATION FOR THE PROPOSED CASINO BY THE FEDERATED INDIANS OF THE GRATON RANCHERIA.

Thank-you,

Kim Meister

Kim Meister
4391 Hessel Rd.
Sebastopol, Ca 95472

Telephone: 707-823-6138

RECEIVED
03 OCT -7 PM 4:
EXECUTIVE SECRETARIAT

(327)

To: Senator Diane Feinstein 8/27/03

From: Kristofer Nelson
60 Regents Circle
Rohnert Park, CA.
94928

Dear Senator Feinstein,

First I would like to thank you for authoring S. 1342, an amendment to the Graton Racheria Restoration Act.

I support the act and believe it is essential to give local communities input into casino locating decisions.

The city of Rohnert Park is deciding on locating a casino within city limits.

I have lived in Rohnert Park for over twenty years and I would like for the citizens of Rohnert Park to have input in the decision making of the casinos location.

Please do all that you can to pass this bill into law as soon as possible.

Please keep me updated on the progress of this bill.

Respectfully,

Kristofer R. Nelson

RECEIVED
03 SEP -4 AM 9:42
OFFICE OF THE
EXECUTIVE SECRETARIAT

592528

328

RECEIVED
03 OCT -9 AM 10: 30
OFFICE OF THE
EXECUTIVE SECRETARIAT

October 2, 2003 694910

Dear Senator Feinstein,

Thank you for authoring S. 1342, an amendment to the Graton Rancheria Restoration Act.
I support this bill because it can give local communities input into the casino locating decision. I am really worried about the well-being of mine and other children, their families and people in general with the idea of having a huge casino and the crowd it will cause on our roads.
Please, get the bill passed and signed into law as soon as possible. And if you would, please keep me updated on the progress of the bill.
Thank you very much.

Sincerely,

Christine Shlegeris

Christine Shlegeris

CC: Congresswoman Lynn Woolsey
Secretary Gale Norton
Mayor Armando Flores

Peggy Soares
4319 Primrose Avenue
Santa Rosa, CA 95407

(329)

RECEIVED
03 OCT -9 AM 8:15
OFFICE OF THE
EXECUTIVE SECRETARIAT

Secretary Gale Norton
331 Hart Senate Office Bldg.
Washington, D.C. 20510

RE: Graton Rancheria Casino Proposal

Dear Secretary Norton:

The Federated Indians of Graton Rancheria recently announced plans for a major Las Vegas –style casino on 366 acres of privately owned land in Southern Sonoma County. We live one block away from the proposed site near Rohnert Park. We have lived in this house for 25 years and we have raised our 4 children here. We have put thousands of dollars into our home and thousand of hours of hard work. This is where my husband and I planned on retiring. All of this is about to be gone because, Rohnert Park thinks this is a quick fix to their financial problems. And our financial problem will just begin. Property values will drop off considerably. Wells will go dry in the summer and properties will flood in the winter, if this casino is allowed to go into our community. Not taking into consideration the problems this will cause the rest of Sonoma County, and California.

It seems like no one is considering the negative impact this is going to have on the wells out here. Rohnert Park is already feeling the water shortage, and many of my neighbors have already had their wells go dry. Where exactly do you think the aquifer water will go after the casino drills their 1000 foot wells? Water doesn't drain uphill. The flooding seems to get worse every year. If you pave over that much open space, do they think there will be less flooding?

This is not just land used for grazing cattle, to fully appreciate this land and all the animals that live here you would truly have to see the vast amount of wildlife we have out here. Red-tailed hawks, red-shouldered hawks, barn owls, screech owls, great horned owls, short eared owls, great blue herons, hooded night herons egrets, buffle heads, cinnamon teals, Canada geese, cooper's hawks, blue birds, orioles, just to name a few of the birds. We also have red and gray foxes, coyotes, raccoons, skunks, turtles, otters and yes "Tiger Salamanders". These will all disappear with the construction of a casino. A casino doesn't belong in a residential neighborhood, it surely doesn't belong in an environmentally sensitive area, and it doesn't belong on this site. Surely there are more appropriate places in the county for this type of development.

Sincerely,

Peggy Soares

Peggy Soares
Southwest Santa Rosa
(707)585-3635

(330)

3

Chuck and Mary Thayer
October 3, 2003

Aurene M. Martin
Deputy Assistant Secretary-Indian Affairs
US Department of Interior.

Hello;

We have owned a home in Rohnert Park since the mid seventies. Since we moved here, Rohnert Park has gone from a very nice planned community to a sprawling small city. We have now outstripped our water and sewage capacities and the traffic here is now a nightmare.

We **do not** want or need a casino in Rohnert Park that will further strain our resources and bring us a myriad of new problems.

Please do not allow the Nevada gambling interests and the developers to force their Agenda on by using a native American tribe as a front.

Thank you very much,
Charles F. Thayer
Charles F. Thayer
Mary J. Thayer
Mary J. Thayer

7146 Barbi Ln.
Rohnert Park, Calif.
94928

RECEIVED
2003 OCT 15 A 9:42
PROGRAM SUPPORT

Halby Marketing, Inc.

290

Halby Marketing, Inc.
P.O. Box 1638
Sonoma, California 95476

.ancheria Fee to Trust Application

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(707) 935-1711 Fax: (707) 935-0350

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Bureau of Indian Affairs
Sacramento Area Office
Attn: 2800 Cottage Way
Sacramento, CA 95825

33823+1846 47

Halby Marketing, Inc.

3317

September 10, 2002

RE: Need for Environmental review for Graton Rancheria Fee to Trust Application

Dear Bureau of Indian Affairs,

The Federated Indians of Graton Rancheria recently announced plans for a major Las Vegas – Style casino facility on almost 2,000 acres of privately owned land in Southern Sonoma County bordering the San Francisco Bay. The property includes environmentally sensitive bay, agriculture and wetlands that have been the subject of conservation efforts for many years and is in a scenic corridor. When Congress passed the bill in 1998 to restore the Tribe's status (H.R. 5528-Boxer), much of the support for the bill was based on the tribe's pledge not to conduct gaming.

In addition to restoring the Tribe's status, the bill directed that the Secretary of the Interior "shall accept land into trust for the benefit of the Tribe any real property in Marin or Sonoma County". This language, perhaps unintentionally, circumvents established federal regulations that govern the fee to trust process. This process normally requires the Bureau of Indian Affairs (BIA) evaluate the environmental impacts of the trust application and consider local and state government input. The "shall" language in the law takes away all agency discretion and would require the Secretary to take land into trust whether it is in downtown San Rafael or in the middle of a nature preserve, without any review, regardless of the planned development of the property.

Graton's trust application should be treated no differently that any other tribe attempting to take private land and transfer it from the state to sovereign status, with the attendant immunity from local land use controls. I urge you to play a leadership role in amending the Restoration Act to change "shall" to "may" so that the otherwise required regulatory review process be able to be applied. Now that it is clear that the Tribe, in fact, does intend to open a casino on the San Francisco Bay, the law should make clear that state gubernatorial concurrence also should be required for the land to be used for gaming, as would ordinarily be the case for land taken into trust after 1988.

Thank you for your consideration of the important issue.

Respectfully yours,

Sharon M. Witsch

cc: Supervisor Valerie Brown

783 Broadway, P.O. Box 1638, Sonoma, California 95476 (707) 935-1711 Fax: (707) 935-0350

Gail Norton
Secretary Of The Interior
1849 C Street Northwest
MS 7229
Washington D.C. 20240

593530

RECEIVED
03 SEP 26 AM 9:37
OFFICE OF THE
EXECUTIVE SECRETARIAT

Fax (202) 208-6956

Regarding Indian Casinos in California:

I did not vote for this imitative. It needs to be reversed. California does not want to become a Las Vegas. I realize some tribes have declined the casino business to be built on their reservations.

Rohnert Park is not a reservation and how this ever got this far is beyond me. Are there any Indian casinos in Utah? I understand Mormons do not subscribe to his type of business.

What ever happened to equal rights and no more?

Please do what you can to reverse this way of using Indians as a cover up for Las Vegas type casinos.

Eunice Edgington

Eunice Edgington
990 Echo Ct.
Rohnert Park, Ca 94928

990 Echo Ct.
Rohnert Park Ca 94928

Gail Norton
Secretary of The Interior
1849 C Street Northwest
MS 7229
Washington DC 20240

4222 Primrose Avenue
Santa Rosa, CA 95407

Telephone: (707) 586-5913
mervisr@aol.com

RECEIVED
SEP 17 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 6, 2003

City of Rohnert Park
6750 Commerce Boulevard
Rohnert Park, CA 95407

Dear City Council:

I am a neighbor of the proposed casino and had signed a petition against it when it was first announced. I did so in the hope that the people planning the casino would work with the neighbors to assure that its negative impact on our small farm lifestyle would not be compromised. My partner asks that I let you know he has always been in favor of the development.

My two main concerns were the wells in the area and the design of the facility itself. Now that I have read about the intent to drill to the lower aquifer, which my engineer son-in-law tells me is a viable plan if properly designed; and have heard that the design is a very classy hotel casino (which I'd like to see, but was unable to stay at the Council meeting the night it was presented), I withdraw my objection to the development. In fact, I would like to compliment the tribe for its foresight in considering these issues.

I believe that development in this particular area is going to happen regardless of what the neighbors prefer. Although a casino wouldn't be my first choice for a neighbor, it wouldn't be my last either. I am very hopeful – and am asking you by writing this letter – that the traffic issues will be handled in such a way that Primrose doesn't become a thoroughfare. It is really important to us that our pets and relative quiet be preserved.

Aside from that, I for one welcome the Federated Indians of Graton Rancheria into our community and look forward to joining them for 99 cent breakfasts!

Sincerely,

Mervis Reissig

Mervis Reissig

Ron Pruitt

Ron Pruitt

cc: Federated Indians of Graton Rancheria
Congresswoman Lynn Woolsey
Congressman Mike Thompson
U.S. Senator Dianne Feinstein
U.S. Senator Barbara Boxer
Honorable Gail Norton
Bureau of Indian Affairs
Honorable George T. Skibine
Supervisor Mike Reilly

RECEIVED
03 SEP 24 AM 9:37
OFFICE OF THE
EXECUTIVE SECRETARIAT

August 10, 2003

George W. Bush, President of the United States
Gale Norton, Secretary of the Interior
Barbara Boxer, U.S. Senator
Diane Feinstein, U. S. Senator
Lynn Woolsey, U.S. Congresswoman
Gray Davis, Governor of California
Joe Nation, State Assembly
John Burton, State Senator
Mike Kerns, Sonoma County Supervisor

593523

Dear Leaders and Representatives:
As a fifth generation Californian, a resident of Sonoma County and San Francisco, and an American citizen, I am angry about the manipulation of laws and regulations by 'rancheria' bands of Indian tribes allowed to profit from gambling, illegal in California except within these tribal 'nations'. The Federated Indians of Graton Rancheria seem unstoppable in their drive to put a gaming casino in the midst of rural open lands.

The land this casino development will be built on is environmentally sensitive, a wetlands nursery for flora and fauna of San Francisco Bay. Although many promises have been made to protect the area, tribal deals have been notoriously poorly managed and the Graton Rancheria Indians, who promised not to open a casino, have already misrepresented their intentions in order to achieve their goals at any cost. The price will be paid in degradation of irreplaceable natural attributes.

I am absolutely FOR the development and education of all of our citizens trapped in poverty. Be they Indians or members of any group, everything should be done to assist in the evolution toward self-reliance and an improved standard of living. However, gambling, and the chaos connected to it, (including the whiff of syndicate/organized crime associated with this deal), and putting our precious natural surroundings in jeopardy, is not the answer.

Further, it is disturbing to feel that nothing can be done to stop this. We seem to have no jurisdiction in our own county. Are we powerless to defend rural values from the actions of a 538-member group with special protections, not benefiting all our citizens?

If the Graton Rancheria leadership really cares about its disadvantaged members and their ancestral lands as it purports to do, a gambling casino in an ecologically vulnerable area would never be its choice.

I beg each of you: do what you can to put a stop to this inappropriate project.
Sincerely,

Perry Walker Freeman
114 Purrington Road
Petaluma, CA 94952
707-778-8140

My name is (Print) Amy Christensen

I live at 579 Lorraine Ct. Rohnert Park 94928

My telephone # is 707-664-8913

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 9/9/03

RECEIVED

My name is (Print) Amy Christensen
I live at 579 Lorraine Ct. Rohnert Park 94928
My telephone # is 707-664-8913

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Sincerely,

Signature _____ Date 9/9/03

RECEIVED
SEP
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN ENERGY AND ECONOMIC DEVELOPMENT

337

My name is (Print) Janice A Raridon

I live at 991 Santa Cruz Way RP

My telephone # is 584 5628

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Janice A Raridon Date 9/10/03

RECEIVED

338b

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Sincerely,

Signature Janice A Raridon Date 9/10/03

RECEIVED
SEP 2 2 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) John G. Pilgrim

I live at 1355 Miramonte Pl. Rohnert Park

My telephone # is 707-795-8163

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature John G. Pilgrim Date 9-8-03

RECEIVED

340-

My name is (Print) John G. Pilgrim

I live at 1355 Miramonte Dr. Rohnert Park

My telephone # is 707-795-8163

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Sincerely,

Signature John G. Pilgrim Date 9-8-03

RECEIVED
SEP 1 5 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

3419

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of The Interior

This letter is to urge you NOT to grant a Trust to the Federated Indians of Graton Rancheria for the designated land just outside of Rohnert Park, California.

The frustrated citizens of Rohnert Park want to tell Washington officials directly how we fell about the destruction of our city. This a University town. The wrong place for a casino

We are 25-year residents of Rohnert Park and along with other citizens, we are going to retire here. A casino being placed here is so wrong and will have a major impact on so many people's lives. Please consider the following impacts on our community:

1. Severe effect on our water supply
2. Environmental impact on our pastoral setting
3. Overcrowded roads and US101
4. Crime reports show 85% higher than average increase where casinos are placed
5. Loss of independently owned businesses
6. The unjust laws that require nothing from the tribes...no taxes paid, no regulations, no fire or police protection. Yet require everything from Rohnert Park, California.

Please, please see our problems and hear our cry for your help. Stop the Trust to the Federated Indians of Graton Rancheria in Rohnert Park, California.

Sincerely,

Patricia J. Miller

Patricia J. Miller

RECEIVED

Auren M. Maritin
Assistant Secretary-Indian Affairs
US Department of The Interior

I have been a resident of Rohnert Park, California for 25 years. During those 25 years I have had the opportunity to move many times. I chose to stay in Rohnert Park because it was a city with family values and a safe environment to raise children. I now proudly call Rohnert Park my home, but all that is changing.

I am writing this letter against the Federated Indians of Graton Rancheria building a Casino in Rohnert Park, California for the following reasons:

1. Water, the water table in our area is dropping at an alarming rate. The casino will deplete water that is needed for our community.
2. Traffic is already at a stop and go pace most of the time. The increase of traffic will burden our roads even more.
3. Casinos create crime. Why should my tax dollars pay for more policemen when the Federated Indians of Graton Rancheria will make millions tax-free. Based upon surveys crime will increase 84%.
4. Local businesses will be run out of business.

Help our City by not granting a Trust to the Federated Indians of Graton Rancheria for the designated land just outside Rohnert Park, California.

Sincerely,

Bruce Miller

Bruce Miller

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

.343

Fax to Aurene M Martin
Assistant Secretary-Indian Affairs
U S Dept of the Interior
1849 C Street Northwest
MS –414—MIB
Washington D.C. 20240

Sept 13, 2003

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Fax (202) 208-5320

Regarding Indian Casinos in California:

I did not vote for this imitative. It needs to be reversed. California does not want to become a Las Vegas. I realize some tribes have declined the casino business to be built on their reservations.

Rohnert Park is not a reservation and how this ever got this far is beyond me. Are there any Indian casinos in Utah? I understand Mormons do not subscribe to his type of business.

What ever happened to equal rights and no more?

Please do what you can to reverse this way of using Indians as a cover up for Las Vegas type casinos.

Eunice Edgington

Eunice Edgington
990 Echo Ct.
Rohnert Park, Ca 94928

September 20, 2003

Joseph and Eileen Perry
1122 Civic center Drive,
Rohnert Park, CA. 94928

(707)585-3144

Aurene M. Martin
Assistant Secretary-Indian Affairs.

Dear Ms. Martin,

We would like you to consider a situation in Rohnert Park. The Federated Indians of Graton Rancheria would like to build a Casino and Hotel complex with the help and money of Nation Casinos of Las Vegas.

The area in question was once part of Rohnert Park and inside city limits. It is now consider a green belt area and the people of this city voted to keep it outside city boundaries for that reason some years ago. It is enviromentally sensitive and also floods in the winter.

This is a small family town and we bought our houses here for that reason. We also have a Unversity in Rohnert Park with many hundreds of young people. We have a water, sewer and traffic crisis right now. As citizens we were never asked if we would like a casino 2 miles from our town center and a few hundred yards from our movie theater and shops.

We are therefore asking The Bureau of Indians affairs not to grant a Trust to the Federated Indians of Graton Rancheria. Thank you for your consideration.

Sincerely,

Joesph & Eileen Perry

Eileen V. Perry

Joseph Perry

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

360 130

24 Hour Mail Service

Business Support Center

Shipping/Notary/Copies/Passport Photos/Fax

6585-E Commerce Blvd., Rohnert Park, CA 94928

Phone (707) 585-2700 **Fax (707) 585-0307**

Fax Transmission

Attn: Aurene M. Martin

Fax #: 202-208-5320 # Pages to follow:

Message:

From:

If there is any problem during transmission, or if documents are received incomplete, please call us at (707) 585-2700.

September 22, 2003

Aurene M. Martin
Assistant Secretary Indian Affairs
US Department of the Interior
1849 C Street Northwest
MS-414-MIB
Washington, D.C. 20240

Fax 202-208-5320

Dear Assistant Secretary Martin:

Rohnert Park is the city between Petaluma and Santa Rosa in Sonoma County, California. We are 45,000+ or – persons.

Graton Rancheria Tribe is intent upon building a **casino complex** in our city. Most people here **do not want** a casino. However, our City Council is encouraging this catastrophe.

We are worried (and Rohnert Park Environmental reports show) that our **water** supply will not support an enterprise that assumes at least 20,000 visitors daily. The casino complex (hotel) will drill its own well and **take water from the aquifer**.

We are worried that the **roads** will not hold up under an extra 20,000 cars daily.

We are worried that **traffic** will be horrendous.

We are worried that additional **police** will be needed. Crime is a given.

The Graton Tribe is not required to take care of any of these items. The people of Rohnert Park will bear the burden of it all.

We do not want a gambling complex in our city.

Sincerely,

Bill + Joan Conner

Bill and Joan Conner
7145 Avenida Cala
Rohnert Park, CA 94928

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

FROM : CARL J. BOWERS PHONE NO. : 707 792 2646 Sep. 22 2003 02:18PM P1/1

Aurene M. Martin
Assistant Secretary of Indian Affairs
U.S, Department of Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C. 20247

Dear Mr. Martin

I am concerned about the attempt of the Graton Indian Tribe to locate a casino in Rohnert Park, Ca. They want to locate it on a flood plain behind the mobile home park my daughter lives in. When the park was first built it did not flood. As commercial building appeared around the park more flood plain was covered and flooding started. It gradually gets worse with each new addition. Now during heavy rain years when the water invades the park, residents are unable to go to work and if out of the park unable to get back home.

I also understand that the existing wells which serve Rohnert Park are depleting the underground water table faster than the water is being restored. They area the tribe wants to build on is a large aquifer that now replenishes the water table for much of the area. What will the loss of this aquifer do to future water supplies when at present we are being pushed to the brink of available water?

This does not even consider the traffic problems the casino would create on the nearby streets. One is a narrow two lane country road that floods with normal rain. The others are regular two lane roads, one of which floods anytime there is a heavy rain storm.

Please consider these important issues and do not approve this location for the casino.

Sincerely,
Karen Lilley
Santa Rosa, Ca.

Karen Lilley
Sept 19, 2003

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Aurene M. Martin
Assistant Secretary of Indian Affairs
U.S, Department of Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C. 20247

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I am concerned about the attempt of the Graton Indian Tribe to locate a casino in Rohnert Park, Ca. They want to locate it on a flood plain behind the mobile home park my daughter lives in. When the park was first built it did not flood. As commercial building appeared around the park more flood plain was covered and flooding started. It gradually gets worse with each new addition. Now during heavy rain years when the water invades the park, residents are unable to go to work and if out of the park unable to get back home.

I also understand that the existing wells which serve Rohnert Park are depleting the underground water table faster than the water is being restored. They area the tribe wants to build on is a large aquifer that now replenishes the water table for much of the area. What will the loss of this aquifer do to future water supplies when at present we are being pushed to the brink of available water?

This does not even consider the traffic problems the casino would create on the nearby streets. One is a narrow two lane country road that floods with normal rain. The others are regular two lane roads, one of which floods anytime there is a heavy rain storm.

Please consider these important issues and do not approve this location for the casino.

Sincerely,
Charles Lilley
Santa Rosa, Ca.

Charles D. Lilley
09/09/03

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

To Aurene M. Martin, 9/22/03

348

I write a plea for help regarding the proposed casino in Rohnert Park, CA. I am a mother of two young children and a homeowner in Rohnert Park. I value the slower paced, fairly safe community. There are many problems associated with the proposal:

1. the traffic on 101 will be horrendous.
2. Crime rate increase. This concerns me deeply!!! Crime in casino cities is 84% higher than national average.
3. The severe impact on our dwindling water supply. (See Rohnert Park Environmental Impact Report SCH No. 99062114.)
4. The impact on local business would be harmful.
5. The Graton tribe will pay no taxes to the city, county, or state & yet we will be required by law to provide police and fire protection!

I recently went on a march with many other Rohnert Park citizens. We were applauded and encouraged by 98% of passers by. Our people are upset and not represented well by the city council.

Please, Do not grant a Trust to the Federated Indians of Graton Rancheria!

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Thankyou for your attention,

Kimberly Musgrove
766 Santa Alicia Dr.
Rohnert Park, CA 94928
707 795 2857

225 Fig Court
Rohnert Park, Ca. 94928
September 13, 2003

Gail Norton
Secretary Of The Interior
1849 C Street Northwest
MS 7229
Washington, D.C. 20240
Fax 202-208-6956

I am writing to oppose the casino complex that the Federated Indians Of Graton Rancheria are planning to build on designated land just outside the city of Rohnert Park, Ca.

Rohnert Park is a small community of approximately 40,000 people. It is primarily a family community with many parks, swimming pools, and green space. Most of the families living here commute to jobs in larger communities on already overcrowded Hwy. 101. The additional traffic this complex would bring to an already difficult traffic situation is estimated to be around 87%, according to figures from Cache Creek Casino in Yolo county.

Additionally, the very flavor of our city, labeled "The Friendly City" would change drastically. US News and World Report cites that crime in casino cities is roughly 84% higher than the national average.

At a local meeting the Federated Indians of Graton Rancheria informed us that the average earnings for employees at this casino would be $20,000. In a city where the average home costs $300,000, it would be impossible for these employees to find homes or places to rent. Where would they live or how would they supplement their income?

Water is an additional concern for our city. Rohnert Park's water supple comes from three large wells for the entire city. At present our water table is already dropping and we have had to alter our water use. Allowing a large casino complex to tap into this water table, without any controls on them, would create a hardship for the whole city.

These are only a few of the issues that cause me to request that you NOT grant the trust for the casino to the Federated Indians of Graton Rancheria.

Sincerely,

Beverly A. LaBone

RECEIVED
SEP 2 3 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

350

P. O. Box 1220
Rohnert Park, CA 94927-1220
September 22, 2003

Aurene M. Martin
Assistant Secretary - Indian Affairs
U.S. Department of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C. 20240
FAX 202-208-5320

Subject: DENY Federated Indians of Graton Rancheria
Casino site plans for Rohnert Park, California

I have been a resident of Sonoma County since 1968 and a Rohnert Park, California resident since 1986 and am appalled at the possibility that trust lands could be granted for a casino to be constructed here in Rohnert Park. Our community is situated in one of the most beautiful areas in California and has experienced a population boom and skyrocketing home prices.

Inter- and intra-city and county traffic is already some of the worst in the Bay Area. Thousands of commuters travel the 101 corridor between Sonoma County and San Francisco daily and we continue to be plagued by traffic congestion and commute nightmares without a casino. There is no relief on the weekends when the tourists pour into the valley and coastal towns. A casino in the midst of our quiet community will not enhance local business and will definitely exacerbate existing traffic problems.

Our community water supply comes from wells and the water table that is rapidly dropping. At the current consumption levels, it is being pumped at approximately 2.5 times the rate it is being replaced by natural means. The size and scope of the casino complex would have a detrimental effect on our water supply.

Unfortunately, Rohnert Park continues to experience increasing crime rates while budget restraints have limited (and sometimes reduced) the safety personnel available to protect the public. With a combined fire and police staff, appropriate staffing and response times put the public at risk.

A recent attempt to construct a casino in southern Sonoma County near Highway 37 was met by angry citizens from Sonoma and Marin Counties so the focus shifted to Rohnert Park. The Bureau of Indian Affairs is sensitive to the negative input received from the adjacent communities and needs to listen to Rohnert Park residents as well.

We DO NOT want a casino in our community either. PLEASE SUPPORT THE LOCAL RESIDENTS DESIRE TO "Keep Cows, Not Casinos."

Sincerely,

Mary M Cook

Mary M. Cook

cc: file

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

FAX 202-208-6956

351

P O. Box 1220
Rohnert Park, CA 94927-1220
September 22, 2003

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Secretary of the Interior
1849 C Street Northwest
MS 7229
Washington D.C. 20240

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Sincerely,

Mary M. Cook

Mary M. Cook

cc: file

RECEIVED
SEP 2 9 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Re H.R. 2656
Stop the Casino in Rohnert Park
California.

Tom Harpham
P.O. Box 277
Glen Ellen, CA 95442
707-935-3930

RECEIVED
SEP 2 3 1996
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Re H.R. 2656
Stop the Casino in Rohnert Park
California.

Tom Harpham
P.O. Box 277
Glen Ellen, CA 95442
707-935-3930

354

To: Aurene M. Martin, Asst. Secretary—Indian Affairs
US Dept of the Interior
1849 C street Northwest
MS-414—MIB
Washington DC 20240
FAX 202-208-5320

Please oppose a casino in Rohnert Park, CA !! Please do not grant a trust to the Federated Indians of Graton Rancheria on the land they are buying just at the city limit of Rohnert Park for a large hotel/casino. Thousands of Rohnert Park area residents are upset about a casino right next to our city. And additionally the large casino complex will use large amounts of water in an area rapidly depleting its groundwater. And we do not want the inevitable increase in traffic and crime.

William McPherson
6063 Elsa Ave.
Rohnert Park CA 94928

RECEIVED
SEP 21 2003
OFFICE OF INDIAN AFFAIRS

355

To: Aurene M. Martin, Asst. Secretary—Indian Affairs
US Dept of the Interior
1849 C street Northwest
MS-414—MIB
Washington DC 20240
FAX 202-208-5320

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William McPherson
6063 Elsa Ave.
Rohnert Park CA 94928

RECEIVED
SEP 2 1 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

356

My name is (Print) J. C. Spaulding

I live at 4174 Avenue - Rohnert Park, CA. 94928

My telephone # is 707-792-8213

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature J. C. Spaulding Date 9/19/2003

RECEIVED

(357)

My name is (Print) Gabe Cross

I live at 539 Anson Ave. Rohnert Park Ca

My telephone # is 888-7946

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 9/19

RECEIVED

358

My name is (Print) EILEEN RILEY

I live at 1049 RUBY COURT SANTA ROSA CA. 95407

My telephone # is 707 526 9279

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Eileen M Riley Date 9/19/03

RECEIVED

359 130

My name is (Print) Holly Hamilton

I live at 4796 Fairway DR RP

My telephone # is 588-2788

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Holly Hamilton Date 9-10-03

RECEIVED
SEP
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 19, 2003

Aurene M Martin
Assistant Secretary – Indian Affairs
US Department of the Interior
1849 C Street Northwest
MS-414—MIB
Washington D.C., 20240

Dear Ms. Martin:

I am a concerned citizen of Rohnert Park, California. I would like to share my concerns with you since my own City Council is not representing nor listening to the residents in this community.

There are negotiations under way to establish the Graton Rancheria adjacent to the Rohnert Park City limits. The Graton Rancheria group was invited to initiate negotiations by Rohnert Park City Council. **Rohnert Park City Council initiated the negotiations despite the overwhelming number of citizens that are against Graton Rancheria coming to our area. If Rohnert Park City Council is so sure that this will benefit the residents, then they should do what is right and put it on the ballot and let us vote!!!** The Rohnert Park City Council is telling the community that there is nothing that can be done to stop the casino.

There are so many areas where I feel that the City Council in Rohnert Park is not representing the residents.

- I believe that this is significant enough of a change to our city, that this should be put on the ballot, and let the residents of Rohnert Park vote whether they want this casino or not!
- We also have a water supply concern. The size and scope of the casino complex will have a severe effect on our water supply.
- Traffic in our area (The 101 Corridor) is already overcrowded. We are concerned about the additional traffic in this area we live.
- Rohnert Park is a small family community. Rohnert Park has worked very hard over the years to make this a safe, friendly, family city. I am concerned about the negative impact this will have on the crime rate in our lovely city, as well as, the additional impact this will have on the Police and Fire Departments.

I could go on further to justify reasons why this Graton Rancheria does not belong here in Rohnert Park, but I will stop here. **Please help our community in doing whatever you can to stop the building of the Graton Rancheria.**

Sincerely,

Donna Preinitz
Rohnert Park Resident

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

361

My name is (Print) Tom Faust

I live at 5728 Dexter Cir. R.P. 94928

My telephone # is 707-483-0353

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

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My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 9-20-2003

RECEIVED
SEP 1 5 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

t O'Dell

My name is (Print) Stephanie Faust

I live at 5728 Dexter Cr. R.P. 94928

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Date 9-20-2003

Sincerely,

Signature Stephanie Faust.

RECEIVED

My name is (Print) GLORIA HAFNER ALLEE

I live at 752 Lindsay Rohnert park 94928

My telephone # is 707-795-0364

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Sincerely,

Signature Gloria Hafner Allee Date 9/19/03

RECEIVED

364)

My name is (Print) William T. Gibson

I live at 770 Holly Ave Rohnert Park

My telephone # is 707 584-0443

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 20 Sep 03

RECEIVED
SEP 2 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

365

My name is (Print) EILEEN PERRY
~~1122 COLE CENTER DR~~
I live at ROHNERT PARK CA
My telephone # is (707) 585-3140

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Eileen V. Perry Date 9/20/03

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

366

My name is (Print) Joseph J. Perry

I live at 1122 Civic Center DR. Rohnert Park, CA

My telephone # is 707 585 3144

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Joseph J Perry Date 9-20-03

(367)

My name is (Print) Kim Peters

I live at 2095 W Hearn Ave Santa Rosa, CA

My telephone # is 542-3179

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Sincerely,

Signature [signature] Date 9-20-03

My name is (Print) MARY C. HILL

I live at 941 HELENE CT ROHNERT PARK

My telephone # is 707-585-7917

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Mary C. Hill Date 9/20/03

(369)

My name is (Print) MARCIA L. LITTLE

I live at 1970 COOPER RD. SEBASTOPOL CA. 95472

My telephone # is (707) 823-4525

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Marcia L. Little Date 9.20.03

Please

RECEIVED

370

My name is (Print) JACQUI McMAHON

I live at 3690 ROBLAR ROAD PETALUMA, CA 94952

My telephone # is 707-792-6942

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jacqui McMahon Date 9/20/03

371

My name is (Print) Mary Hertz

I live at 4320 Hargrave Ave

My telephone # is 584-4730

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Mary Hertz Date 9/20/03

RECEIVED

(372)

My name is (Print) Judith B. Gibson

I live at 770 Holly Ave. Rohnert Park, Ca.

My telephone # is (707) 584-0443

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Judith B. Gibson Date 20 Sept 2003

OFFICE

373

My name is (Print) Kelly Krshul

I live at 519 1/2 Goodman Ave. Santa Rosa CA 95407

My telephone # is n/A

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 9-16-03

374)

My name is (Print) Debbie Dickerson

I live at 1273 St. Francis Dr.

My telephone # is (707) [redacted]

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Debbie Dickerson Date 9-16-03

My name is (Print) Amy L. Beason

I live at 4473 La Bath Santa Rosa CA 95407

My telephone # is (707) 584-9641

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Amy L Beason Date 9/4/03

My name is (Print) NIRMAL SAHERCHAN

I live at SANTA ROSA

My telephone # is 5795719

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Sincerely,

Signature [signature] Date 09/09/03

RECEIVED

377)

My name is (Print) Jane Frye

I live at 4796 Fairway Dr. Rohnert Park

My telephone # is 588-2788

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jane Frye Date 9-10-03

378

My name is (Print) Byron Blodgett

I live at Healdsburg, CA.

My telephone # is (707) 836-9050

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 9-10-03

RECEIVED

379

My name is (Print) Doris A. Sanz

I live at 2426 Alta ave.

My telephone # is 707-664-0643

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Doris A. Sanz Date 9/9/03

RECEIVED
SEP 11 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESOURCES MANAGEMENT

380)

My name is (Print) MARJORIE JEAN HOOBLER (MRS. John L.)

I live at 7102 ADRIAN DRIVE, ROHNERT PARK, CA.

My telephone # is 707/795-6451

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Marjorie Jean Hoobler Date 9/9/03

RECEIVED

381

My name is (Print) JOHN HOOBLER

I live at 7162 Hahnai Dr. R. Park

My telephone # is 707/795-6451

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Sincerely,

Signature John L. Hoobler Date Sept. 9, 03

RECEIVED

(382)

My name is (Print) Marie A. Esparza

I live at 44 VERDE CIRCLE Rohnert Park

My telephone # is (707) 584-5522

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Marie A. Esparza Date 9.20.03

383

My name is (Print) Margaret Fuller

I live at 5730 Davis Cir R P

My telephone # is 584-7224

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Sincerely,

Signature Margaret Fuller Date 9-20-03

My name is (Print) Mindy Naslund

I live at 850 Russell Ave. #C-10, Santa Rosa, CA 95403

My telephone # is

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Sincerely,

Signature Mindy Naslund Date 9-20-03

385

My name is (Print) Jim Gerraus

I live at 782 Millbrae Ave S.R.

My telephone # is 707 586 3757

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Sincerely,

Signature Jim Gerraus Date 9-20-03

RECEIVED

My name is (Print) Cora Lee Root

I live at 6351 Country Club DR - 208 R.P. CA 94928

My telephone # is 707 585 2585

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Cora Lee Root Date 9-20-'03

387

My name is (Print) Marlene Navarrete

I live at 4470 Labath ave Santa Rosa Cal

My telephone # is (707) 206-0795

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Marlene Navarrete Date 9/21/03

RECEIVED

My name is (Print) Jose G. Navarrete Jr

I live at 4470 Labath Ave Santa Rosa Cal

My telephone # is (707) 206-0795

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Sincerely,

Signature Jose G Navarrete Jr Date 9-21-03

RECEIVED

My name is (Print) Martha Navarrete

I live at 4470 Labath ave Santa Rosa ca.

My telephone # is 707-206-0795

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Sincerely,

Signature Martha Navarrete Date 9-21-03

RECEIVED

390

My name is (Print) Alex Navorrete

I live at 4470 Lobath Ave Santa Rosa Cal

My telephone # is (707) 206-0795

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Sincerely,

Signature Alex Navarrete Date 9-21-03

RECEIVED

391

My name is (Print) Dean Bogert

I live at 3052 Mule Deer Ln South Santa Rosa Ca 95407

My telephone # is (707) 566 9689

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Dean Bogert Date 9/20/03

RECEIVED

392

My name is (Print) WAYLAND LEE

I live at 1347 CORNELL AVE, ROHNERT PARK, CA 94928

My telephone # is 707-664-8516

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Wayland Lee Date 9-20-03

RECEIVED

My name is (Print) Jerilynn Wagner

I live at 798 Belglen Way, Sebastopol

My telephone # is 707 823-7840

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Sincerely,

Signature_____ Date_____

RECEIVED

My name is (Print) Tiffany Oropeza

I live at 200 Willowgreen Place Santa Rosa CA 95403

My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Tiffany Oropeza Date 9-11-03

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

130

395

My name is (Print) Sheila Smith

I live at 634 W. Cotati Ave, Cotati CA 94931

My telephone # is

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Sincerely,

Signature Sheila Smith Date 9/13/03

My name is (Print) Natalie Oropeza
I live at 200 Willowgreen Place Santa Rosa CA 95403
My telephone # is 707 523-1333

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Sincerely,

Signature Natalie Oropeza Date 9-11-03

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) CHRISTEFER BRAIN

I live at 2036 ALEXIS CT. SANTA ROSA, CA 95405

My telephone # is

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Sincerely,

Signature Christefer Brain Date 9-11-03

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS

My name is (Print) VICTOR BRAIN

I live at 2036 ALEXIS CT SANTA ROSA, CA 95405

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Victor Brain Date 9-11-03

RECEIVED

RECEIVED
SEP 23 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) KATHERINE BRAIN

I live at 4749 HARROW CT. SANTA ROSA CA 95405

My telephone # is

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Sincerely,

Signature Katherine Brain Date 9-11-03

RECEIVED
03 SEP 23 PM 12:32
OFFICE OF THE
EXECUTIVE SECRETARIAT
593486

My name is (Print) WILLIAM E. CONANT

I live at 1294 BLOOMFIELD RD, SEBASTOPOL

My telephone # is 829-5388

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature William E. Conant Date 9/9/03

RECEIVED
SEP 2 2 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

410 401

My name is (Print) Suzanne Dodd

I live at 1915 Gardenview Circle, Santa Rosa 95405

My telephone # is unlisted

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Suzanne Dodd Date 9-8-03

RECEIVED
SEP 1 3 2003
BUREAU OF INDIAN AFFAIRS

419 402

My name is (Print) Vicki Jackson

I live at Knolls in Santa Rosa

My telephone # is 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Vicki V. Jackson Date 9-10-03

RECEIVED

My name is (Print) Yesenia Chavez

I live at 2133 Quintin place santa Rosa Ca. 95407

My telephone # is (707) 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Yesenia Chavez Date

RECEIVED
BUREAU OF INDIAN AFFAIRS

421 404

My name is (Print) Maria Chavez

I live at 2133 Quintin Pl. Santa Rosa Ca. 95407

My telephone # is (707) 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Maria Chavez Date 9/09/03

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

422 405

My name is (Print) Andrea Carter

I live at 5465 Petaluma Hill Rd Santa Rosa

My telephone # is 707-577-0663

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 9/10/03

RECEIVED

MIKE THOMPSON
1st District, California

COMMITTEES:
AGRICULTURE
ARMED SERVICES

423

406

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515

DISTRICT OFFICES:
1040 Main Street, Suite 101
Napa, CA 94559
(707) 226-9898

317 Third Street, Suite 1
Eureka, CA 95501
(707) 269-0595

Post Office Box 2208
Fort Bragg, CA 95437
(707) 962-0930

CAPITOL OFFICE:
119 Cannon House Office Building
Washington, DC 20515
(202) 225 3311

May 6, 2003

To: Bill Allan
Bureau of Indian Affairs
916/978-6099

From: Cheryl Diehm
Congressman Mike Thompson
707/226-9898
707/251-9800 fax

Re: Graton Rancheria

Could you please provide us notice of any environmental document filed by or on behalf of the Federated Tribes of Graton Rancheria s pursuant to any land acquisition in Sonoma County.

Thank you.

Printed on recycled paper.

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20240

IN REPLY REFER TO:

MEMORANDUM

To: Regional Director, Pacific Region

From: Office of Indian Gaming Management

Subject: Public Comments

Date: October 2, 2003

Enclosed are comments received from the public concerning matters currently under consideration by your regional office. They are forwarded to you for appropriate action.

Ione (Pinoyumtiki)
Jamul
Pauton (Rohnert)
Timbisha (Hesperia)

RECEIVED
DATE 10/3/03
BY RPM

,407)

407

Gail Norton
Secretary of the Interior
US Department of the Interior
1849 C Street Northwest.
MS-7229
Washington D.C. 20240

Re: **Rohnert Park, California Federated Indians of Graton Rancheria plan for 300+ acre casino and hotel-**

Dear Ms. Norton,

I am writing in **protest** to the 300+ acre casino project that is being proposed in Rohnert Park, CA. If the project goes through, it will be the largest casino near a residential population in the San Francisco Bay area. I live in an unincorporated area of our small community and it breaks my heart to know that I will have to move if this project goes through. I moved to this county for it country feel, good schools, and community involvement. I am a 'transplant" from Southern California. If I wanted to live near a crowded hotel and casino, I NEVER would have moved to an unincorporated farming community where my neighbors are vineyards and cows. **We already have a casino in our county!!!!** We don't need another. Please do not support the purchase of this land by the Federated Indians of Graton Rancheria and the Station of Casinos of Las Vegas, NV. Thank you for your time and consideration.

Sincerely,

Amy Pamatmat

Amy Pamatmat
1039 W. Sierra Ave.
Cotati, CA 94931
(707) 795-2918

FROM : FAX NO. : Sep. 26 2003 12:16PM P1

/408/
408

Aurene M. Martin
Assistant Secretary- Indian Affairs
US Department of the Interior
1849 C Street Northwest.
MS-414-MIB
Washington D.C. 20240

Re: **Rohnert Park, California Federated Indians of Graton Rancheria plan for 300+ acre casino and hotel-**

Dear Ms. Martin,

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Sincerely,

Amy T. Pamatmat

Amy Pamatmat
1039 W. Sierra Ave.
Cotati, CA 94931
(707) 795-2918

FROM : FAX NO. : Sep. 26 2003 12:20PM P2

Fax Cover Sheet

To: Aurene M. Martin
Assistant Secretary- Indian Affairs
Fax#: (202) 208-5320
From: Amy Pamatmat
Fax#: (707) 795-2919

RE: NO SUPPORT FOR 300+ ACRE CASINO AND HOTEL IN ROHNERT PARK CALIFORNIA.

PROJECT BEING PROPOSED BY: FEDERATED INDIANS OF GRATON RANCHERIA AND THE STATION OF CASINOS OF LAS VEGAS, NV

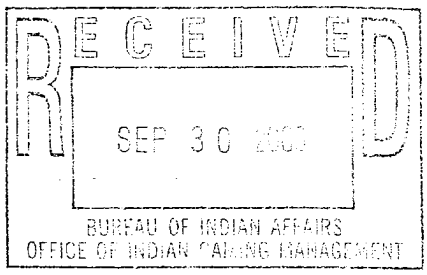
RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

409 409

Stop the Casino 101 Coalition

Sonoma County, California
www.stopthecasino101.com

URGENT FAX



DATE: September 25, 2003

TO: Honorable Aurene M. Martin, Ass't Secretary-Indian Affairs
Department of the Interior
Fax: 202-208-5320

FROM: Marilee Montgomery
Phone/Fax (please call before faxing): 707-588-9926

re: Propsed Rohnert PArk casino site

Page One of Two

Copy of 9/22/03) email from H.R. Downs, President of the O.W.L. (Open Space, Water Resource, Land Use) Foundation, Penngrove, CA., setting forth the potential problems the casino for Sonoma County water supplies and water rights re: Graton Rancheria casino:

"Yes, the casino, using the unique "super rights" of Native Americans, would have federal water rights. Establishing a federal water right on top of a proven groundwater overdraft area automatically creates a legally unstable atmosphere that would set the Graton Rancheria tribe and the City of Rohnert Park on an inevitable collision course. It would be only a matter of time before the casino wells either run dry or start pumping brackish water. When that happens the United States Attorney General would appear and engage in nasty litigation. In the end, most likely, what is left of the groundwater in the southern Santa Rosa plain would be adjudicated. The Indian tribe would get the lion's share, then (probably) the residents of Penngrove, then Cotati, then SSU. Rohnert Park residents would be last because they are the most recent arrivals. But no one, not even the Indians, will be pleased with adjudication; look south at the 14 districts that have suffered this lengthy, extremely expensive process and you can see than none of the participants are satisfied.

Wells nearby the proposed site are already experiencing difficulties. The purported plan, as reported in the press, for multiple 1,000 foot wells, represents a huge draw. The five (?) restaurants, 200-some-odd room hotel, gardens, wet bars, and other water-intensive facilities suggest water use of vast proportions. Most domestic wells range from 50 to 450 feet.

Not far from the proposed casino site is a very large well, the Todd Road "emergency" well operated by SCWA that has been pumping water 24 hours a day for the last three years (suggesting, incidentally, that we have been in an emergency for some time). This well alone pumps more water in a day than the entire, now famous, study area will recharge in a day. This famous study, conducted by PES Environmental, proved groundwater overdraft in Rohnert Park, Cotati, SSU and various surrounding unincorporated areas including Penngrove. The whole study area recharges at 1.6mgd and the Todd Road emergency pump (which is immediately adjacent to but conveniently

located outside this study area) pumps 1.7mgd. Rohnert Park alone pumps 4.3mgd. If the casino is permitted to fire up multiple one-thousand foot wells inside this area we should expect nearby domestic wells to go dry or to gush degraded water, as has happened in a circle around the Todd Road pump.

If the casino, or any other large operation there, is given surface water instead, so that they needn't tax the overdraft, then we run into the very serious problem of the ongoing NOAA Fisheries study that promises to substantially reduce Eel River diversions. NOAA has already estimated in its biological opinion that those reductions could be 80%. Just like the groundwater, there is very little surface water left.

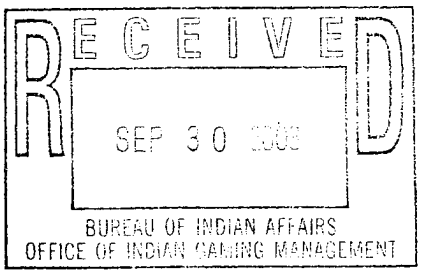
Either way, this casino proposal has little to do with gambling, Native American history, architectural appropriateness, or any other issue other than water.

Regards,
H.R. Down"

410

410

130



September 26, 2003

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of the Interior
Fax: 202-208-5320

Aurene:

I am writing in regard to the casino project currently being discussed in Rohnert Park California.

On behalf of myself, my husband and my three daughters who live in the area proposed for this casino, I am asking for your help in stopping this project. My family lives in the country and moved here for a chance to raise our girls in a healthy, happy environment. We want swingsets not slot machines in our backyard.

The traffic on the frontage road is unbelievable and should this casino be built it will be a living nightmare. My family will be subjected to increased crime, increased traffic, a major decrease in water quality, the environmental impact on the land surrounding my home will be unbearable and unhealthy for my family. My heart breaks thinking that I have done everything in my power to give my girls a wonderful childhood and now it can all be taken away without any concern for the citizens directly affected.

Knowing that people can drink 24 hours a day and then get into a car and drive down my street is every parents biggest fear – how can I keep my girls safe in this environment. The local officials here in Rohnert Park don't seem to care - We are asking you as parents and very concerned citizens to help us stop this project – our children are our future and we need to protect them with everything we have.

Many Thanks
Jubs & Sally Begley

Jubs & Sally Begley
815 Scenic Ave
Santa Rosa, CA 95407
707-585-0538

202 208 5320

411 41 30

BETTY ANNE GOULD

704 Brett Avenue • Rohnert Park, CA 94928 • (707) 792-1573

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

September 25, 2003

Ms. Aurene M. Martin
Deputy Assistant Secretary of Indian Affairs
U.S. Department of the Interior
1849 C Street NW MS4140MIB
Washington, DC 20240

Dear Ms. Martin:

This letter is written to voice my strong opposition to the Graton Rancheria Indian tribe acquiring property in the city of Rohnert Park for the purpose of building a casino and hotel complex.

This deal is not supported by the residents of Rohnert Park. Rohnert Park is a family-oriented community and its design, amenities, and neighborhoods reflect this.

The thought of a casino in this residential community is outrageous. Please take action to stop the advancement of this plan immediately.

Sincerely,

Betty Anne Gould

Sent by: Yarnee Taylor Montgomery

SWM

412 412 30

Suni Warcloud Montgomery
1521 Sarkesian Drive ~ Petaluma, California 94954-4408

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

norable Aurene M. Martin, Ass't. Secretary - Indian Affairs
ited States Department of the Interior
49 "C" Street, NW
ashington, DC 20240

Federated Indians of Graton Rancheria Rohnert Park, CA casino site

ar Assistant Secretary Martin:

n writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by Federated Indians of the Graton Rancheria, and to express my support for HR2656. The Federated lians of Graton Rancheria plan to use the site for a huge, Las Vegas-style casino. This is not a servation"; it is a commercial development which would never be allowed to be built in this nmunity on this land under any other circumstances. The tribe has so much money behind it from s Vegas developers (Station Casinos) and local developers (Kenwood Investments), and our state vernment officials receive so much money from Indian gaming that people like me have nowhere to to stop a project like this.

e proposed casino site is an Agricultural Preserve area and important Vernal Wetlands. It is habitat endangered California species and provides food and nesting areas for migrating waterbirds in the ring. It is a flood plain and drainage system for the County. It is also a groundwater recharge area signated by the State of California.

e have all just learned in yesterday's paper that Sonoma County's water supply is bankrupt, and that re is *no* additional water for new projects. The Tribe plans to sink multiple1,000 to 2,000 foot lls, but the aquifer in this area is already in a negative recharge situation. This casino will pump llions of gallons of water each day, and could dry up private wells that are the only water supply for arby homes.

e have had serious traffic problems on Highway 101 for decades, and this project is supposed to ng 20,000 additional cars each day, twenty-four hours a day. Highway 101 can't take that additional ffic, nor can the surface streets.

hnert Park is also a college town, and I don't believe that a casino is an appropriate business to have a town with so many young people in it. Casinos do attract crime and drugs wherever they are ated. A casino would forever change this whole area for the worse.

s Vegas gambling interests are cynically abusing the Federal land trust system, put into place to help tive Americans secure property for homes, and they will profit directly from this misuse of the deral trust system. We can't fight Las Vegas money by ourselves. Please - help us keep this project t of our city.

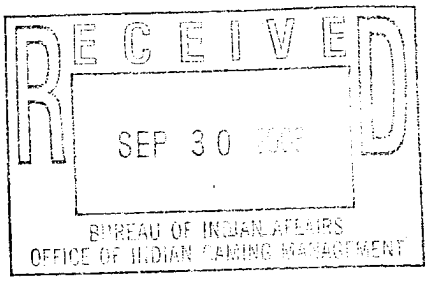
icerely,

ni Warcloud Montgomery

152 Wilfred Avenue
Santa Rosa, California 95407

413 413

:ptember 28, 2003



onorable Aurenen M. Martin, Ass't. Secretary-Indian Affairs
nited States Department of the Interior
349 "C" Street, NW
'ashington, DC 20240

: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

ear Assistant Secretary Martin:

m writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed the Federated Indians of the Graton Rancheria, and to express my support for the legislation oposed by Lynne Woolsey and Dianne Feinstein. The Federated Indians of Graton Rancheria n't want a place to build their homes and raise their families. They want to cash in by using e federal land into trust system to build a huge casino on land that Sonoma County voters have signated as Agricultural Preserve. Nobody would be allowed to build this kind of project here, d I don't think that this tribe should be allowed to build it, either.

e members of this tribe are *not* a disenfranchised, downtrodden group living in shanty houses; ey are everyday citizens who have been working and living in the community at large for nerations. But thanks to the raptors from Las Vegas, the tribe has so much money behind it m Station Casinos that stopping this project is like trying to stop a juggernaut; we're just tting rolled over and flattened. Our state government officials from Gray Davis to Joe Nation ceive so much money from Indian gaming that I, a life-long Democrat, am voting in the recall ection for Arnold Schwarzenegger, who promises to stop this abuse.

y house would be only 100 yards from this casino, and most casinos in California have proved be bad neighbors. I've lived here for twenty-five years, and planned to stay here until I died, t in all probability, I would have to sell my house to escape the noise, traffic, and crime that uld invade our peaceful rural neighborhood if this casino is built.

e all voted, tribal members included, for a County General Plan that saved this whole area for riculture. What is the point of community planning if the federal government allows instant bes to go reservation shopping in order to build these giant casinos with all their attendant oblems? Las Vegas has found a bonanza in this situation, and is exploiting the federal process r their own profit, at the expense of the communities in which these casinos are built.

e have serious water problems here, and I don't want to risk losing my well or losing our water ghts to the tribe. We have bad traffic problems, and I don't think the tribe has enough money or ll give any money - since typically, they haven't - to mitigate the traffic impact.

ease, do not allow this Rohnert Park site to be taken into trust. Don't let Las Vegas into our me town.

ncerely, Peter Z. Jackson

ter Z. Jackson

rilee Taylor Montgomery

orable Aurene M. Martin, Ass't. Secretary-Indian Affairs
ed States Department of the Interior
) "C" Street, NW
hington, DC 20240

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

414
714

Federated Indians of Graton Rancheria Rohnert Park, CA casino site

r Assistant Secretary Martin:

writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by the Federated Indians of the on Rancheria, and to express my support for HR2656. The Federated Indians of Graton Rancheria plan to use the site not for es, but for a sprawling Las Vegas-style casino with a 300 room hotel, spa, multiple restaurants, fast food franchises, a 2,000 seat rtainment venue and a 2,000 slot machine casino on 150-plus acres of 380 total acres immediately outside the Rohnert Park City its.

en the Federated Indians of Graton Rancheria petitioned the Federal government for tribal status, they promised that they would not to build a casino. Now, having lied to the government of the United States, they are asking you to declare their casino site a ervation". This cynical abuse of a system put into place to help Native Americans secure property for homes is being bankrolled by ion Casinos Inc., a Las Vegas casino development consortium, which will profit directly from this misuse of the federal trust em.

proposed casino site is designated in the Sonoma County General Plan as an Agricultural Preserve area, and is also Vernal llands. It is adjacent to modest homes and dairy farms, and on the southern side, is immediately adjacent to a Senior Citizens' bile Home Park. These Vernal Wetlands are habitat to endangered California species and are an important resource for migrating er fowl each Spring. As a flood plain and drainage system for hundreds of square miles of the County, these Wetlands are an ortant flood control asset. They are a vital water replenishment system for the Santa Rosa Plain Aquifer, which is already seriously leted.

ause there is no additional water capacity within the Sonoma County Water Agency, the Tribe plans to sink multiple1,000 to 2,000 t wells for this project. The City of Rohnert Park was successfully sued in 1999 for pumping too much groundwater from City ls, causing the surrounding area's private wells to run dry. This casino will need millions of gallons of water per day. Recycling d water for irrigation or toilets will not soften the impact on the aquifer; eventually the wells will suck outward, thus, affecting vate wells that are the only water supply for nearby homes.

sewage capacity of the Santa Rosa sub-regional system is already undersized . Much of the capacity for the growth of the county l cities that is dependent on our sub-regional system could be used up by this single project, leaving none for the current or future ds of the community at large.

impact of the proposed casino on the social, economic and natural resources of this area is beyond definition. The Highway 101 ridor, already in serious trouble, is not equipped to handle the traffic that this project would generate, nor are the two-lane rural ds flanked by homes that would be the points of entry to the casino. Families, including my own, would be displaced from their nes by the road-widening that would be necessary for the project.

s time for the Federal government to put a stop to the abuse of the federal land trust system, and prevent Las Vegas interests from ther exploiting the process. Further, this site is inappropriate for commercial development in general and for a large casino in ticular.

ase - withhold reservation status for this site!

ry truly yours,

M. Taylor Montgomery

rilee Taylor Montgomery

414

SWM

Suni Warcloud Montgomery
1521 Sarkesian Drive ~ Petaluma, California 94954-4408

RECEIVED
SEP 30 2005
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

onorable Aurene M. Martin, Ass't. Secretary - Indian Affairs
nited States Department of the Interior
49 "C" Street, NW
ashington, DC 20240

: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

ear Assistant Secretary Martin:

m writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by e Federated Indians of the Graton Rancheria, and to express my support for HR2656. The Federated dians of Graton Rancheria plan to use the site for a huge, Las Vegas-style casino. This is not a eservation"; it is a commercial development which would never be allowed to be built in this mmunity on this land under any other circumstances. The tribe has so much money behind it from s Vegas developers (Station Casinos) and local developers (Kenwood Investments), and our state vernment officials receive so much money from Indian gaming that people like me have nowhere to to stop a project like this.

e proposed casino site is an Agricultural Preserve area and important Vernal Wetlands. It is habitat endangered California species and provides food and nesting areas for migrating waterbirds in the ring. It is a flood plain and drainage system for the County. It is also a groundwater recharge area signated by the State of California.

e have all just learned in yesterday's paper that Sonoma County's water supply is bankrupt, and that ere is *no* additional water for new projects. The Tribe plans to sink multiple1,000 to 2,000 foot ells, but the aquifer in this area is already in a negative recharge situation. This casino will pump llions of gallons of water each day, and could dry up private wells that are the only water supply for arby homes.

e have had serious traffic problems on Highway 101 for decades, and this project is supposed to ng 20,000 additional cars each day, twenty-four hours a day. Highway 101 can't take that additional ffic, nor can the surface streets.

hnert Park is also a college town, and I don't believe that a casino is an appropriate business to have a town with so many young people in it. Casinos do attract crime and drugs wherever they are ated. A casino would forever change this whole area for the worse.

s Vegas gambling interests are cynically abusing the Federal land trust system, put into place to help tive Americans secure property for homes, and they will profit directly from this misuse of the deral trust system. We can't fight Las Vegas money by ourselves. Please - help us keep this project t of our city.

icerely,

ni Warcloud Montgomery

Copy of 9/22/03) email from H.R. Downs, President of the O.W.L. (Open Space, Water Resource, Land Use) Foundation, Penngrove, CA., setting forth the potential problems the casino for Sonoma County water supplies and water rights

Yes, the casino, using the unique "super rights" of Native Americans, would have federal

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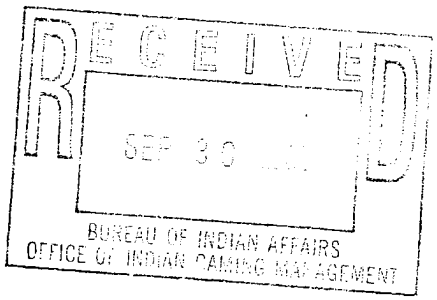

225 Fig Court
Rohnert Park, Ca. 94928
September 13, 2003

Aurene M. Martin
Assistant Secretary-Indian Affairs
US Department of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D.C., 20240
Fax 202-208-5320

I am writing to oppose the casino complex that the Federated Indians Of Graton Rancheria are planning to build on designated land just outside the city of Rohnert Park, Ca.

Rohnert Park is a small community of approximately 40,000 people. It is primarily a family community with many parks, swimming pools, and green space. Most of the families living here commute to jobs in larger communities on already overcrowded Hwy. 101. The additional traffic this complex would bring to an already difficult traffic situation is estimated to be around 87%, according to figures from Cache Creek Casino in Yolo county.

Additionally, the very flavor of our city, labeled "The Friendly City" would change drastically. US News and World Report cites that crime in casino cities is roughly 84% higher than the national average.

At a local meeting the Federated Indians of Graton Rancheria informed us that the average earnings for employees at this casino would be $20,000. In a city where the average home costs $300,000, it would be impossible for these employees to find homes or places to rent. Where would they live or how would they supplement their income?

Water is an additional concern for our city. Rohnert Park's water supple comes from three large wells for the entire city. At present our water table is already dropping and we have had to alter our water use. Allowing a large casino complex to tap into this water table, without any controls on them, would create a hardship for the whole city.

These are only a few of the issues that cause me to request that you NOT grant the trust for the casino to the Federated Indians of Graton Rancheria.

Sincerely,

Beverly A. LaBone

Beverly A. LaBone

416

1416

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

My name is (Print) Andrea Carter

I live at 5465 Petaluma Hill Rd Santa Rosa

My telephone # is 707-577-0663

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 9/10/03

RECEIVED
SEP 30 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

417
417

My name is (Print) Maria Chavez

I live at 2133 Quintin Pl. Santa Rosa Ca. 95407

My telephone # is (707) 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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Sincerely,

Signature Maria Chavez Date 9/09/03

418)

418

My name is (Print) Yesenia Chavez

I live at 2133 Quintin place santa Rosa Ca. 95407

My telephone # is (707) 526-7046

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Sincerely,

Signature Yesenia Chavez Date

RECEIVED
SEP 1 0
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRIBAL SERVICES

419

419

My name is (Print) Vicki Jackson

I live at Knolls in Santa Rosa

My telephone # is 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Vicki V. Jackson Date 9-10-03

RECEIVED

420

420

My name is (Print) Suzanne Dodd

I live at 1915 Gardenview Circle, Santa Rosa 95405

My telephone # is unlisted

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Suzanne Dodd Date 9-8-03

RECEIVED
SEP 8
BOARD OF SUPERVISORS
OFFICE OF THE CLERK

421

421

My name is (Print) WILLIAM E. CONANT

I live at 1294 BLOOMFIELD RD, SEBASTOPOL

My telephone # is 829-5388

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature William E Conant Date 9/9/03

RECEIVED
SEP 10
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST ACCOUNTABILITY MANAGEMENT

422

422

My name is (Print) VICTOR BRAIN

I live at 2036 ALEXIS CT SANTA ROSA, CA 95405

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Victor Brain Date 9-11-03

RECEIVED
SEP 30
BUREAU OF INDIAN AFFAIRS
MIDDLE PACIFIC AREA OFFICE

423

V\423

My name is (Print) CHRISTEFER BRAIN

I live at 2036 ALEXIS CT. SANTA ROSA, CA 95405

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Christefer Brain Date 9-11-03

RECEIVED

424)
1424

My name is (Print) Tiffany Oropeza
I live at 200 Willowgreen Place Santa Rosa CA 95403
My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Tiffany Oropeza Date 9-11-03

RECEIVED

COWS NOT CASINOS

Somehow the people in charge in Washington D.C. are under the impression that everyone is satisfied with the plan to put the Graton Rancheria tribe's casino adjacent to the Rohnert Park city limits. For some reason our local officials are not telling them about all of us that are more than unhappy with the decision. Therefore, it's time to tell the Washington officials directly how we feel about the destruction of our "Friendly City".

Please FAX a letter TODAY to the following persons and let them know how you feel and urge them not to grant a Trust to the Federated Indians Of Graton Rancheria for the designated land just outside Rohnert Park. It is important to send a FAX rather than email or regular mail. It is also important that we do not simply send pre-formatted letters that all look the same. Either hand write or type a letter explaining your feelings about the proposed casino. The Bureau Of Indian Affairs is sensitive to negative input from adjacent communities and wants to make sure the tribes are welcomed before granting them Trust.

Please write your letters TODAY!! There are several things that should concern you about the casino that you might want to mention:

1. The size and scope of the casino complex will have a severe effect on our water supply. Geological studies have shown that the water table is rapidly dropping due to over consumption that is occurring today. Water is being pumped out at roughly 2.5 times the rate it is being replaced by natural means (see the Rohnert Park Environmental Impact Report SCH No. 99062114).
2. Increased traffic on US101 and streets around town will be become overcrowded (again). This is what has happened on HWY16 outside the Cache Creek casino in Yolo county- traffic volume is up by 87% (Time magazine Dec 23, 2002 reporting on a Caltrans study).
3. Overall crime in our "Friendly City" is expected to increase. US News and World Report reports that crime in casino cities is roughly 84% higher than the national average.
4. The casino will likely have a negative effect on the local economy buy removing money from local businesses. For example, before gambling in Atlantic City there were 243 independently operated restaurants. 10 years later there were only 146.

   Steve Wynn, CEO of Mirage casinos, told a Bridgeport, Conn., audience in 1992: "There is no reason on earth for any of you to expect for more than one second that just because there are people here, they're going to run into your store, or restaurant, or bar.... It is illogical to expect that people who won't come to your restaurants or stores today will go to your restaurants or stores just because we happen to build this building here."
5. The Graton tribe will not be required to abide by any state or local regulations, including minimum wage, environmental, workers compensation to name only a few. They pay no taxes to the city, county, or state and yet we are required by law to provide them with police and fire protection.

Please FAX your letters to the following individuals:

Aurene M. Martin
Assistant Secretary - Indian Affairs
US Department Of The Interior
1849 C Street Northwest
MS-414--MIB
Washington D.C., 20240
FAX 202-208-5320

Honorable George W. Bush
President Of The United States
1600 Pennsylvania Ave
Washington D.C.
C/O Andrew Card, Jr. - Chief Of Staff
FAX 202-456-1907

Gail Norton
Secretary Of The Interior
1849 C Street Northwest
MS 7229
Washington D.C., 20240

FAX 202-208-6956

Honorable Dick Cheney
Vice President Of The United States
1600 Pennsylvania Ave
Washington D.C.
C/O Lewis Libby - Chief Of Staff
FAX 202-456-7044
456-2710

426

1426

My name is (Print) NATALIE CRAIG

I live at 5241 OLD REDWOOD HWY #E SANTA ROSA

My telephone # is 707-577-7724

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 9/8/03

RECEIVED
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

427)

My name is (Print) Robert Oropeza

I live at 200 Willowgreen Place Santa Rosa CA

My telephone # is 707 542-6200

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Robert Oropeza Date 9/8/03

RECEIVED

428

428

My name is (Print) SANDRA CONANT

I live at 1294 BLOOMFIELD RD. SEBASTOPOL, CA

My telephone # is 707 829-5388

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Sandra Conant Date 9-8-03

RECEIVED

429)

My name is (Print) Josephine Oropeza

I live at 200 willowgreen Place Santa Rosa CA

My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Josephine Oropeza Date 9/8/03

RECEIVED

430

430 1

My name is (Print) ADAN CHAVEZ

I live at 2133 QUINTIN PL. SANTA ROSA CA 95407

My telephone # is 707 526-7046

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature adan chavez Date 9/08/03

RECEIVED

(431)
431

My name is (Print) Robert O'Dell

I live at 4471 Labath Ave, Santa Rosa, CA 95407

My telephone # is 707 585 2632

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Robert O'Dell Date 9-7-03

RECEIVED
BUREAU OF INDIAN AFFAIRS
ADMINISTRATIVE SERVICES MANAGEMENT

1432
432

My name is (Print) Jennifer Burton

I live at 9001 conde LN #2 Windsor CA 95492

My telephone # is (707) 620-1055

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jennifer Burton Date 9-6-03

RECEIVED

L433
433

My name is (Print) Alberto Yanez S.
I live at 766 Brittain Santarosa CA 95403
My telephone # is 526-4309

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Alberto Yanez Sr Date 9-6-03

434

434

My name is (Print) Jessica Burton

I live at 766 Brittain Ln. Santa Rosa CA, 95403

My telephone # is 526-4309

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jessica Burton Date 9-6-03

To: Tom Hartman 130
for Secretary or Secretarial

435

DEPARTMENT OF THE INTERIOR

TASKING PROFILE

ACCN #:	326878	**Status:**	C	**Fiscal Year:**	2004
Document Date 10/16/2003	**Received Date** 10/17/2003	**Due Date**	**Action Office** BIA	**Signature Level** AA	**Doc Source** WH

Addressee: Gale A. Norton

From: Boyer, Cecelia
Special Asst to the Vice President

Washington
DC 20250

Subject Text: Sent several (approximately 50) letters written to Vice President Cheney re opposition to casinos in California

Recommended Surnames:

Mail Carrier: PM **Mail Track#:**

Cross Reference:

Copies To: ES

Status Tracking:

Correspondence Specialist: Akeary **Corresp. Specialist Phone:** 208-3572

Closed Comments:

Signed:

45U

695220

OFFICE OF THE VICE PRESIDENT

WASHINGTON

RECEIVED

03 OCT 17 AM 9:16

OFFICE OF THE
EXECUTIVE SECRETARIAT

TO: Ms. Amy Keary
Executive Secretariat
Mail Stop 7229, Department of the Interior
18th and C Streets, NW
Washington, DC 20240

DATE: October 16, 2003

We are forwarding the enclosed constituent mail for your information. It is not necessary to send a copy of your reply to this office.

Should you have questions about these procedures or need to provide updated contact information, you may reach me by telephone at 202.456.9002 or by fax at 202.456.7044.

Sincerely,

Cecelia Boyer

Cecelia Boyer
Special Assistant to the Vice President
for Correspondence

9/24/03

436

436

Dick Cheney;

please please, no casinos!

If you lived in our area, you would understand. Houses are going up like mad, on Stony Point Rd, traffic is a issue. As it is on Todd Rd, sometimes I stand a long time, just to cross the Rd, to get my mail.

Save the trees + cows what left. There will be crime among other things. this is suppose to be country out here, not a city.

we vote NO.

Vern & Marie Crabtree
769 Todd Rd
Santa Rosa, CA 95407-8067

Vern & Marie Crabtree
769 Todd RD
Santa Rosa CA 95407

NORTH BAY CA 949
PM 1
3A
24 SEP
2003

USA

Honorable Dick Cheney.
Vice President of the United States
1600 pennsylvania ave
Washington, D.C.
C/o Lewis Libby - Chief of Staff

004#100

1#112

9/20/03

<437, 437

~~Attn~~.

Dear Mr. Dick Cheney,

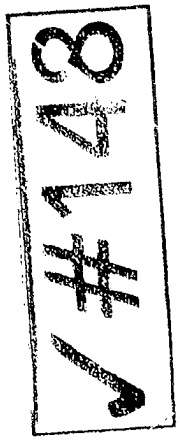
I strongly disapprove of the Casino planned for the City of Rohnert Park, CA

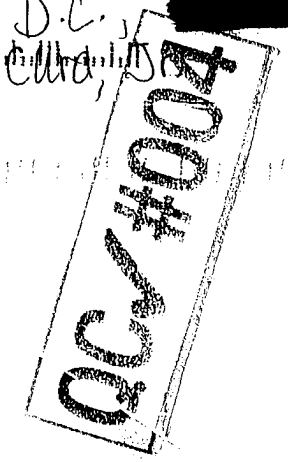
Thank you
Siobhain Bradford
Concerned Resident

Siobhain Bradford
7258 Alma Ave
Rohnert Park, CA 94928

S. Bradford
1258 alma ave
Rohnert Park, CA 94928

Honorable Dick Cheney
Vice President of the United States
1600 Pennsylvania Ave
Wastington D.C., [redacted]
C/o Andrew Card, DC





L438 | 438

OCTOBER 7, 2003

DEAR HONORABLE DICK CHENEY,

I AM A RESIDENT OF ROHNERT PARK, CALIFORNIA, and I am writing to notify you of my serious doubts and deep concern over the plan to put Graton Ranchera tribe's casino next to my city limits. I moved to Rohnert Park over 20 years ago because of its reputation as a family friendly city. I am concerned that a casino would negatively affect families here - possible increases in crime, sure increases in traffic and water table depletion in our immediate area.

Please DO NOT grant a Trust to the Federated Indians of Graton Rancheria for the designated use of land outside of Rohnert Park for a casino.

Thank you for listening to my concerns

Sincerely,
LINDA SHANE, 180 FIRETHORN DR, ROHNERT PARK, CA 94928
~~Linda Shane~~

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME STEVE CLARK

ADDRESS 7605 CAMINO COLLEGIO, ROHNERT PARK, CA, 95928

SIGNATURE Steve Clark

DATE 9/27/03

My name is (Print) Matthew C. Manning

I live at 4987 Fern Pl Rohnert Park, CA 94927

My telephone # is 707-331-0584

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Matthew C. M Date Sep 27, 2003

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Matthew C Manning

ADDRESS P.O. Box 2508 Rohnert Park CA 94927

SIGNATURE Matthew C. M

DATE Sep 27, 2003

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME CHRISTA MANNING

ADDRESS PO BOX 2508

SIGNATURE Christa M Manning

DATE 9/27/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME ALBERT MONTTAPA.

ADDRESS 8008 Manchester Ave. Rohnert Park CA 94928.

SIGNATURE [illegible]

DATE 10/4/03

(442)

442

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME John R. Pinheiro

ADDRESS 5040 Nature Ln. Sebastopol CA 95472

SIGNATURE

DATE 4 Oct 03

I believe God is waiting on all of his people to do what ever they can during this time of judgement. Should we decide as a country to continue on the path we are headed with disreguard to Gods laws, we will reap what we sow.

History does repeat itself because we refuse to learn from others mistakes. Wise men learn from others mistakes but fools don't.

During the Civil War Days the issue was Slovery. The northerners who knew better paid the higher price than the southerners who saw no wrong. Check it out, it took 3 northerners to kill one southerner. When the issue was resolved the war came to an end.

470

Sincerely Mark A Lepley
(707) 792-6880
8600 LANCASTER DR
ROHNERT PARK CA 94928

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Ken Olson

ADDRESS 7061 Fellers Ln Sebastopol CA 95472

SIGNATURE Kenneth L Olson

DATE 10-4-03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Catherine L. Bryant

ADDRESS 1356 Mattice Ln. Rohnert Park CA 94928

SIGNATURE [signature]

DATE 10/3/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Kathy L. Pitt

ADDRESS 5277 Wendell LN. Sebastopol, Ca 95472

SIGNATURE Kathy L Pitt

DATE 10/4/03

446

446

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME David Sullivan

ADDRESS 734 Lindsay Ave, Rohnert Pk, Ca. 94928

SIGNATURE

DATE 10-4-03

Dear Sir 10-11-05

I am concerned about the moral condition of this country as a whole. I'm a Dad + Husband in a house hold of 6 total.

We are facing a proposed Las Vegas-style Gambling Casino being built at the edge of town, Rohnert Park Calif. 94928. This project we are told has none of the normal controls concerning its construction due to the fact that it is on Indian land.

God has made us a promise in the Bible 2 CHRONICLES 7:13-14 It states

When I shut up the heavens so that there is no rain, or command locusts to devour the land or send a plague among my people, if my people, who are called by my name, will humble themselves and pray and seek my face and turn from their wicked ways, then will I hear from heaven and will forgive their sin and will heal their land.

Surely you are aware of all the plagues that are coming on this country.

I'm doing my best to raise my children to do what's right so that they will be prepared to help run this country in the future.

I do need help from your end to help change the laws to turn around the Casino business in this country.

471

My name is (Print) THOMAS J. STAHL

I live at 4 ARBOR CT, COTATI, CA. 94931

My telephone # is 707-664-0782

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

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The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Thomas J. Stahl Date 10/12/03

449

449

My name is (Print) Bella Rose

I live at 8300 Liberty Ave, Rohnert Park

My telephone # is 707 795 1677

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Bella Rose Date 10/12/03

My name is (Print) Lisa Martin

I live at 203 Mendelssohn Ct Cotati, CA 94931

My telephone # is (707) 664-0170

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Sincerely,

Signature Lisa Martin Date 10-12-03

451 | 451

My name is (Print) Carrie Crandall

I live at 4301 Primrose Ave. Santa Rosa, 95407

My telephone # is 586-1970

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Carrie Crandall Date 10/12/03

My name is (Print) ANNE MARQUEZ

I live at 59 VARDA ST RP, CA 94928

My telephone # is 707 792-2663

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Anne Marquez PhD Date 10-12-03

453

My name is (Print) Justyn Delbridge

I live at 4301 Primrose Ave.

My telephone # is (707) 586-1970

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Justyn Delbridge Date 10-12-03

477

454

My name is (Print) Jordan Rose

I live at 8300 Liberty Ave

My telephone # is 795-1677

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Sincerely,

Signature Jordan Rose Date 10/12/03

455

455

My name is (Print) LAURA PELLERITI

I live at 8270 Honor Place, Cotati CA 94931

My telephone # is 707-795-6513

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Laura Pelleriti Date 10/12/03

456

My name is (Print) Dana Malivert

I live at 8670 Camino Colegio #121, Rohnert Park

My telephone # is (707) 792-1748

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Dana Malivert Date 10/12/03

457

My name is (Print) Kimberlee Loo

I live at 5791 Volkerts Rd. Sebastopol, CA 95472

My telephone # is 823-2749

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Kimberlee Loo Date 10/12/03

458

My name is (Print) Linda Donahue

I live at 5821 Lowell St

My telephone # is 707 795-7399

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Sincerely,

Signature Linda Donahue Date 10-12-03

459

My name is (Print) Linda Wood

I live at 582 Lorraine Ct. R.P. Ca. 94928

My telephone # is

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Sincerely,

Signature Linda Wood Date 10-12-03

460

My name is (Print) Natalie Villalobos

I live at 12 Kingston Way, Cotati CA 94931

My telephone # is (707) 332-4246

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Natalie Villalobos Date 10/12/03

461

My name is (Print) DOUGLAS J. ROST

I live at 809 CIANA CT. ROHNERT PARK, CA 94928

My telephone # is 707-792-0975

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

My name is (Print) Anamaria Hogue

I live at 7321 Bonde Way, Rohnert Park, CA 94928

My telephone # is 707-795-3867

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I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature Anamaria Hogue Date Oct 12, '03

My name is (Print) Aria Hornback 463

I live at 7378 Carriage ct, Rohnert PK, CA

My telephone # is 707-665-0572

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 10-12-03

OFFICE OF THE VICE PRESIDENT
WASHINGTON

TO: Ms. Amy Keary
Executive Secretariat
Mail Stop 7229, Department of the Interior
18th and C Streets, NW
Washington, DC 20240

DATE: November 4, 2003

We are forwarding the enclosed constituent mail for your information. It is not necessary to send a copy of your reply to this office.

Should you have questions about these procedures or need to provide updated contact information, you may reach me by telephone at 202.456.9002 or by fax at 202.456.7044.

Sincerely,

Cecelia Boyer

Cecelia Boyer
Special Assistant to the Vice President
for Correspondence

696391

RECEIVED
03 NOV -6 PM 5:30
OFFICE OF THE
EXECUTIVE SECRETARIAT

To: Tom H.
for forwarding to GA

130

165

DEPARTMENT OF THE INTERIOR

TASKING PROFILE

ACCN #:	326887	Status:	C	Fiscal Year:	2004
Document Date	**Received Date**	**Due Date**	**Action Office**	**Signature Level**	**Doc Source**
11/04/2003	11/06/2003		BIA	AA	WH

Addressee: Gale A. Norton

From: Pasion-Caiani, Elie

349 Westbrook Dr
Santa Rosa
CA 95401

Subject Text: Writes to Vice President Cheney in opposition of the Casino planned for Rohnert Park, California

Recommended Surnames:

Mail Carrier:

Mail Track#:

Cross Reference:

Copies To: ES

Status Tracking:

Correspondence Specialist: Akeary

Corresp. Specialist Phone: 208-3572

Closed Comments:

Signed:

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Elie Pasion-Caiani

Address 349 Westbrook Drive, Santa Rosa, CA 95401

Signature Elie Pasion-Caiani

Date 10.6.03

400

My name is (Print) Sienna Hornback

I live at 7378 Carrice ct, RP, CA

My telephone # is 707 665 0572

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Sienna Hornback Date 10-12-03

490

My name is (Print) DAVID CUMMINS

I live at 34 REGENTS CIR ROHNERT PK, CA 94928

My telephone # is 707- 664-9051

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 10/12/03

409

My name is (Print) STEVEN YEAGER

I live at 8912 ~~COTATI~~ CLOTHIER LANE, COTATI

My telephone # is 792 0702

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Steven H. Yeager Date 10/11/03

468

468

My name is (Print) LISA RICCI

I live at 207 MENDELSSOHN CT COTATI

My telephone # is (707) 480 3824

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Sincerely,

Signature Lisa Ricci Date 10/12/03

492

My name is (Print) Andrea Woodcock

I live at 1949 E. Cotati Ave # 2835 Rohnert Park, CA

My telephone # is (707) 665-2524

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature [signature] Date 10/12/03

470

470

My name is (Print) Pauline Wlodarczyk

I live at 7581 Bonita Ave. Rohnert Park, Ca. 94928

My telephone # is

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Pauline Wlodarczyk Date 10-12-03

494

11-4-03

471

Assistant Secretary Martin,

I am writing concerning the proposed Casino near Rohnert Park, Ca. I live less than a mile from this property. I think that this is the wrong location for any large scale development. Here are some of my bigger concerns.

Water Table - The local aquifer is already being depleted.

Flooding - All local roads are very flood prone, development would make it worse.

Farms - I see this land as much more useful as a farm.

Traffic - I would fear drunk drivers and no longer bike ride with my kids.

Wetlands - This is environmentally sensitive land.

We love our peaceful neighborhood. This is NO place to put a huge luxury casino. Please say NO to the Federated Indians of Graton and their Las Vegas partners!

Sincerely,

Carrie Crandall
4301 Primrose Ave.
Santa Rosa, Ca. 95407
707-586-1970

,472
472

November 10, 2003

Aurene M. Martin
Assistant Secretary of Indian Affairs
1849 C Street Northwest
MS-414 -MIB
Washington D.C. 20240

RECEIVED
2003 NOV 13 P 3: 32
EXECUTIVE SECRETARIAT

Dear Ms Aurene,

I would like to voice my opposition to the proposed CASINO that is planned by the Graton Rancheria in the County of Sonoma, adjacent to the City of Rohnert Park, on Stony Point Road, between Wilfred Avenue and the Rohnert Park Expressway.

My opposition is based on the following:

1. The proposed site is located on agricultural land that is shown in the County General Plan as a Community Separator – not zoned nor planned for high density use.
2. The site is in an environmentally sensitive area, adjacent to the Laguna de Santa Rosa.
3. The proposal would require public sewer service. The existing sewer treatment plant is not sized to allow the connection of a Hotel and Casino as proposed. The sizing of the plant is based on the current General Plans of the County and the Cities that are connected. None of these General Plans include a Hotel and Casino.
4. The proposal would require connection to a public water source. Water service to the City of Rohnert Park is through the Sonoma County Water Agency Aqueduct and from wells. Currently the City of Rohnert Park is using in excess of their entitlement in the aqueduct. There is no additional capacity for this proposal. Water wells are out of the question. The aquifer is already over pumped with the existing City of Rohnert Park wells being inadequate to supply the City.
5. The proposal would generate considerably traffic. The local roads are inadequate to handle this increase.
6. Studies from other states have indicated that crime increases after a casino has been placed in a community. This is a residential community. Increase in crime is not acceptable.

Sincerely,

Paul Schoch Pat Schoch

Paul and Pat Schoch
335 Sparkes Road
Sebastopol, CA 95472

494

October 17, 2003

Bureau of Indian Affairs
1849 C Street Northwest
Washington D.C. 20240

Greetings,

I want to register my protest to the proposed casino in Rohnert Park as loudly as humanly possible.

This kind of establishment in an urban area, near a college as well as other schools, is certainly not in the best interests of our children. The home owners in the immediate area (many with children), almost without exception, are totally against this casino in their neighborhood.

It also is not good for the small businesses in the area. Much of the time and money spent at the casino would have been spent at other places of entertainment, restaurants, etc. in the area.

The jobs it is supposed to create will be mostly low paying jobs and not enough to live in this expensive area.

It will put a further burden on the already crowded Highway 101 and the other streets in that area.

It attracts an element that will contribute to an increase in crime and other problems in the area.

This project is to be located on wetlands where there are many environmental issues. Why has this not been brought up?

Reports have been received from other areas where they have Indian gaming, and big promises were made of positive contributions to the community and not kept.

The majority of the people in the Rohnert Park area as well as Sonoma County are against this addition to our community. It is sad that the City Council of Rohnert Park has ignored the wishes of their own people, and Sonoma County Supervisors have done little or nothing to prevent it from happening.

I respectfully ask that you do whatever you can to keep this casino from coming to Rohnert Park.

Sincerely,

Pearl Burkart

Pearl J. Burkart
3236 Indian Rock Court
Santa Rosa CA 95404

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME RALPH J. FIRNENO

ADDRESS 1352 PARKWAY DRIVE Rohnert Park CA 94928-4746

SIGNATURE [signature]

DATE 10/04/03

490

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Michele Fain

ADDRESS 5860 Gilmore Ave
Cotati, CA
94931-9727

SIGNATURE Michele V. Fain

DATE 10/4/03

476

476

My name is (Print) Brigitte Grimshaw

I live at 523 Anson Ave.

My telephone # is 707-795-8683

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Brigitte Grimshaw Date 10/12/03

500

My name is (Print) SEAN MADISON

I live at 5245 McFARLANE RD.

My telephone # is 707 829 8526

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

478

478

My name is (Print) Karen Hudson

I live at 7816 Medallion Way

My telephone # is 795-7859

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Sincerely,

Signature Karen Hudson Date 10-12-03

502

My name is (Print) Sharona ES

I live at 702 Racquet Club Circle Rohnert Park 94927

My telephone # is ~~585~~ (707) 588-8729

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature _____ Date 10/12/03

1480

480

My name is (Print) Beth Field

I live at 4425 Acacia Wy Penngrove, CA 94951

My telephone # is 707-664-8514

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Beth Field Date 10/12/03

504

481

My name is (Print) Carol Kelly

I live at 7241 Camino Colegio Rohnert Park CA 94928

My telephone # is 707 795 6080

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Carol Kelly Date 10/12/03

1482
482

My name is (Print) J Carter

I live at 1451 E Cotati Ave #3 Rohnert Park CA

My telephone # is (707) 292-3778

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature J Carter Date 10-12-03

500

483

My name is (Print) James Kennemer - Washburn

I live at 339 Bonnie Avenue Rohnert Park CA 94928

My telephone # is (707) 792-0759

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Sincerely,

Signature [signature] Date 10/11/03

4847
484

My name is (Print) Frances Hammond

I live at 839 Lightwood Ct

My telephone # is 707 7930287

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Frances Hammond Date 10/12/03

509

My name is (Print) Tim Hudson

I live at 7816 Medallion Way, Rohnert Park

My telephone # is

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Sincerely,

Signature Tim Hudson Date 10/12/03

486

My name is (Print) Jeff Boyd

I live at 7272 Camino Colegio #48 - Rohnert Park, 94928

My telephone # is 795-8441

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jeff A. Boyd Date 10/12/03

510

My name is (Print) Julie Shidler

I live at 4705 Fairway Dr, Rohnert Park CA 94928

My telephone # is (707) 585-2001

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Julie Shidler Date 10/12/03

9/24/03

488 488

Dick Cheney:
please please, no casinos!
If you lived in our area, you would understand. Houses are going up like mad, on Stony Point Rd, traffic is a issue. As it is on Todd Rd, sometimes I stand a long time, just to cross the Rd, to get my mail.
Save the trees + cows what left. There will be crime among other things. this is suppose to be country out here, not a city.
we vote NO.

Vern & Marie Crabtree
769 Todd Rd
Santa Rosa, CA 95407-8067

512

9/20/03

489

~~Attn~~.

Dear Mr. Dick Cheney,

I strongly disapprove of the Casino planned for the city of Rohnert Park, CA

Thank you
Siobhain Bradford
Concerned Resident

Siobhain Bradford
7258 Alma Ave
Rohnert Park, CA 94928

400

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME STEVE CLARK

ADDRESS 7605 CAMINO COLEGIO, ROHNERT PARK, CA, 94928

SIGNATURE Steve Clark

DATE 9/27/03

491

491

My name is (Print) STEVEN YEAGER

I live at 8912 ~~[illegible]~~ CLOTHIER LANE, COTATI

My telephone # is 792 0702

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Steven H. Yeager Date 10/11/03

492 \492

My name is (Print) Natalie Oropeza

I live at 200 Willowgreen Place Santa Rosa CA 95403

My telephone # is 707 523-1333

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Natalie Oropeza Date 9-11-03

RECEIVED

493)

493

My name is (Print) Jose G Novarrete

I live at 4470 LaSalle Ave Santa Rosa Cal

My telephone # is (707) 206-0795

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Jose G Novarrete Date 9-21-03

Bessie Jacobson

RECEIVED
03 SEP 12 AM 9:16
OFFICE OF THE
EXECUTIVE SECRETARIAT

We do not need a Casino in Rohnert Park. These are the people who 5 years ago stated that if they were granted tribe status they would not build a Casino. Please no Casino in Rohnert Park. We have too many in the area now.

592992

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Beth M Schubert
948 Hudis St.
Rohnert Park, Ca
94928

Margery Swartz
842 Hudis St
Rohnert Park, CA 94928

Dale Hitzeman
4439 Hillview Way
Rohnert Park, Ca. 94928

Gladys V. Hitzeman
4439 Hillview Way
Rohnert Park, Ca 94928

Mary V Jackson
4726 Country Club Drive
Rohnert Park CA 94928

RECEIVED
RJM 9/23/03

219

August 28, 2003

Senator Diane Feinstein
One Post Street
Suite 2450
San Francisco, CA 94104

RECEIVED
SEP 15 2003
BUREAU OF INDIAN AFFAIRS
OFFICE OF INDIAN GAMING MANAGEMENT

Senator Feinstein:

Thank you for authoring S. 1342, an amendment to the Graton Rancheria Restoration Act.

I believe that any community near the possible location of a casino should have input as to the location of that Casino.

It would certainly be appreciated if you would set

RECEIVED
BY RPM DATE 9/23/03

this bill passed, and signed into law as soon as possible.

Please keep me updated on the progress of the bill.

With heartfelt thanks

Bessie M. Jacobson
1386 Brenda Way
Rohnert Park, CA 94928

c: Congresswoman Lynn Woolsey
Secretary Gale Norton, Department of the Interior
Mayor Armando Flores, Rohnert Park

1158 Santa Cruz Way
Rohnert Park, CA 94928
707-585-8448

ES

695195

Citizens Against the Casino

03 OCT 16 AM 9:53

OFFICE OF THE
EXECUTIVE SECRETARIAT

495

Fax

209

To:	Gail Norton	**From:**	Lisa Bagwell
Fax:	202-208-6956	**Pages:**	1
Phone:		**Date:**	10/15/2003
Re:	NO Casino in or around Rohnert Park, CA	**CC:**	

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

I live in Rohnert Park, CA where the Federated Indians of Graton Rancheria are trying to bring a casino just outside the city limits. The majority of citizens in Sonoma County do **NOT** want a casino near our city Rohnert Park. The image a casino gives off is not the one we've worked many years to build in our family community.

Please help pass Bill #HR2656.

Please help us put a stop to the Federated Indians of Graton Rancheria!

Lisa Bagwell

RECEIVED
2003 OCT 16 A 10:31
EXECUTIVE SECRETARIAT

143

My name is (Print) Ellen A Johnsen

I live at 412 Corte Pintado, Rohnert Park, CA 94928

My telephone # is 707-584-9014

RECEIVED
03 OCT 15 PM 12:55
OFFICE OF THE
EXECUTIVE SECRETARIAT

694857

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

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Sincerely,

Signature Ellen A Johnsen Date 9-28-03

RECEIVED
03 OCT -7 PM 12:54
OFFICE OF THE
EXECUTIVE SECRETARIAT

694657

(134)

October 17, 2003

RECEIVED
03 OCT 23 AM 10: 36
OFFICE OF THE
EXECUTIVE SECRETARIAT

695652

Gail Norton
Secretary of Interior
1849 C Street Northwest MS 7229
Washington D.C. 20240

Greetings,

I want to register my protest to the proposed casino in Rohnert Park as loudly as humanly possible.

This kind of establishment in an urban area, near a college as well as other schools, is certainly not in the best interests of our children. The home owners in the immediate area (many with children), almost without exception, are totally against this casino in their neighborhood.

It also is not good for the small businesses in the area. Much of the time and money spent at the casino would have been spent at other places of entertainment, restaurants, etc. in the area.

The jobs it is supposed to create will be mostly low paying jobs and not enough to live in this expensive area.

It will put a further burden on the already crowded Highway 101 and the other streets in that area.

It attracts an element that will contribute to an increase in crime and other problems in the area.

This project is to be located on wetlands where there are many environmental issues. Why has this not been brought up?

Reports have been received from other areas where they have Indian gaming, and big promises were made of positive contributions to the community and not kept.

The majority of the people in the Rohnert Park area as well as Sonoma County are against this addition to our community. It is sad that the City Council of Rohnert Park has ignored the wishes of their own people, and Sonoma County Supervisors have done little or nothing to prevent it from happening.

I respectfully ask that you do whatever you can to keep this casino from coming to Rohnert Park.

Sincerely,

Pearl Burkart

Pearl J. Burkart
3236 Indian Rock Court
Santa Rosa CA 95404

Oct. 17, 2003

498

The Honorable Gale Norton,

Just a note to let you know my family is opposed to the Rancheria Casino. Rohnert Park is a very family oriented city and a casino is not a good influence on the children.

Mr. and Mrs. L.P. Wing
8478 Lombard Way
Rohnert Park, Calif. 94928

Mrs. Darlene M. Wing

695653

RECEIVED
03 OCT 23 AM 10: 36
OFFICE OF THE
EXECUTIVE SECRETARIAT

(124)

10/17/03

499

The Honorable Gale Norton
695650

RECEIVED
03 OCT 23 AM 10: 36
OFFICE OF THE
EXECUTIVE SECRETARIAT

Dear Mis Norton

I am writing this to express my opposition to build a Casino just outside the city limits of Rohnert Park, Ca. a city of 40,000. There are three casino's within 50 miles of Rohnert Park, the Casino planned for Rohnert Park by the Graton Rancheria tribe is over kill for this area. The Casino will only bring major problems to this community.

Please deny their request for Federal approval which I understand is required.

Respectfully
Don Backens

D.A. BACKENS
4349 FAIRWAY DR
ROHNERT PARK, CA 94928

RECEIVED
03 OCT 23 AM 10:30
OFFICE OF THE
EXECUTIVE SECRETARIAT

I am writing you on the subject of the pending casino site in Rohnert Park. I am 35 years old and finally have reached the American dream of owning my own home. This has been a dream come true. One of the reasons for our decision to move to Rohnert Park was the family oriented community. Now that I have finally bought a home the next step would be to raise children. The other reason is the rural countryside the city is nestled in. Sonoma County has always been known for its cows, farms, as well as vineyards. To make a long story short my husband and I were extremely disappointed with the thought of placing a casino very close to our new home. The councils reasoning are that the city needs the money. I grew up in Marin County that has become too expensive to purchase a home. That is another reason we have moved to Rohnert Park, the money is on its way. Many people from Marin are moving north. Putting a Casino here is just going to chase people away, especially people who want to start a family. Its not just people that live in Sonoma County who feel this way, all friends, family, colleagues etc. feel very strongly the casinos are a horrible idea and don't understand why its happening. People are outraged and feel they are not being heard. Please hear us and help stop this totally inappropriate location for an Indian casino. Thankyou very much for taking the time to read this letter.

Suzanne Murphy

4551 HARMONY PLACE
ROHNERT PARK 94928

Aurene M. Martin
Assistant Secretary - Indian Affairs
US Department Of The Interior
1849 C Street Northwest
MS-414--MIB
Washington D.C., 20240
FAX 202-208-5320

501 130

Dear Assistant secretary Martin,

I am writing to tell you of my concerns about Graton Rancheria tribe's plans for a casino just outside my city limits.

I do not want a casino in my area and I worry about crime increasing and the burden that will place on my city's police department. The site chosen for the casino is an important environment that needs to be protected, not built upon. The water table in our county is dropping already and cannot support a large hotel-casino complex

Please do not allow designation of our local county property to a Trust to the Federated Indians of Graton Rancheria.

Sincerely,
Linda Shane
180 Firethorn Drive
Rohnert Park CA 94928

November 24, 2003

Re: Casinos in Rohnert Park, California

Please help us keep our area safe by **not allowing casinos** in Rohnert Park.

Thank you,

Valerie Kasnick

Valerie Kasnick

Tom Kasnick

Tom Kasnick

Heidi Pabros

Heidi Pabros

Marijke Esmeyer

Marijke Esmeyer

October 4, 2013 130

503

Dear Ms Norton,

My husband and I have lived in Rohnert Park for over 4 years and we love this community. However, regarding the proposed Graton Rancheria Tribe Casino on Stony Point Road in Rohnert Park we are absolutely opposed. We already have casinos north of us where people can go and spend their time and $$.

Traffic is already a problem and we already have enough crime in this community. Having this casino would only bring in more vehicles and a lot more crime.

As the saying goes "Not in my neighborhood". Please review and listen to all of the questions before deciding on this very important issue.

Rohnert Park is a great place to live. Please do not allow the casino to come to our town

Karen Wagner
1331 Middlebrook Way
Rohnert Park, Ca. 94928

Honorable Gail Norton
Secretary of the Interior Department
Department of the Interior
Washington, D.C. 20240

Dear Honorable Gail Norton,

I am writing to you to inform you of my support for the Federated Indians of Graton Rancheria's proposal to develop an entertainment/casino facility at the intersection of Highway 37 and Lakeville Highway in Southern Sonoma County.

The Federated Indians of Graton Rancheria proposal will be good for the Tribe, and the people of Sonoma and Marin Counties. It will create hundreds of new, good paying jobs, add much needed revenue to the County and local government budgets and will ensure that the members of the Gaton Rancheria attain self-reliance. Additionally, I am in favor of the proposals being discussed by the tribe to establish hundreds of new acres on the project site for open space and wetlands restoration.

I urge you to support the Federated Indians of Graton Rancheria's proposal.

Very truly yours,

Jesse J. Henry

697796

RECEIVED
03 DEC -8 PM 12:09
OFFICE OF THE
EXECUTIVE SECRETARIAT

505

1158 Santa Cruz Way
Rohnert Park, CA 94928
707-585-8448 Fax: 707-584-2945

Action Against the Casino

Fax

To:	Gail Norton	**From:**	Lisa Bagwell
Fax:	202-208-6956	**Pages:**	1
Phone:		**Date:**	12/7/2003
Re:	NO Casino in or around Rohnert Park, CA	**CC:**	

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** x **Please Reply** ☐ **Please Recycle**

I live in Rohnert Park, CA where the Federated Indians of Graton Rancheria are trying to bring a casino just outside the city limits. The majority of citizens in Sonoma County do NOT want a casino near Rohnert Park. The image a casino gives off is not the one we've worked many years to build in our family community.

The proposed site adjacent to Rohnert Park, CA has extremely devastating impacts to the surrounding communities of Sonoma Co. This site has no historical connection with the Graton Rancheria. This site is a prime example of Las Vegas Nevada reservation shopping to the determent of the families of California.
This site is in our County separator, surrounded by homes with wells that will run dry, if this World Class Casino Resort is allowed. This site is next door to a 348 mobile home park were the families will not be able to sleep at night from the noise alone. These are tax paying citizens that will have no water and no value to their homes. The surrounding areas do not have the infrastructure to support the increased traffic, crime and environmental impacts that this Casino will bring.

Please move forward Senate Bill 1342.

Thank you,

Lisa Bagwell

Lisa Bagwell

506

RECEIVED

697953

03 DEC -9 AM 10:40

OFFICE OF THE
EXECUTIVE SECRETARIAT

ALBERT E. DAWSON
342, ALISON AVE,
ROHNERT PARK
CA. 94928.

12-8-03.

TO HONORABLE GALE NORTON
SECRETARY OF THE INTERIOR.

THE 4 MEMBERS OF ROHNERT PARK CITY COUNCIL MET BEHIND CLOSED DOORS THEN OK'D A CASINO IN ROHNERT PARK.

WE GOT SIGNATURES WELL IN EXCESS OF REQUIRED #'S OF REGISTERED VOTERS ONLY TO BE TOLD THIS IS A REFERENDUM AND WILL NOT BE PUT TO A VOTE OF THE PEOPLE.

TO ME "WE THE PEOPLE" MEANS JUST THAT AND THIS MATTER SHOULD BE VOTED ON.

IN MY COLLECTION OF A LITTLE OVER 120 SIGNATURES I ONLY RECEIVED 20 REFUSAL'S, AND THIS PRETTY MUCH POINTS OUT "WE THE PEOPLE" DON'T WANT THIS!!!

WE HAVE JUST HAD WATER METERS INSTALLED & RATES INCREASED, BECAUSE WE MUST CONSERVE WATER, BUT A CASINO USER OF APPROX 1 MILLION GALLONS A DAY HAS BEEN ALLOWED. OUR CITY GOVERNMENT IS ALSO AWARE THAT WE ALSO HAVE A HWY 101 CROWDED AT NIGHT, SOME PEOPLE HAVING TO INCREASE JOURNEY HOME BY 1 HOUR ALREADY, YET A CASINO WILL ADD A MASSIVE AMOUNT TO THE TRAFFIC ON HWY. 101.

PLEASE DO NOT LET THEM DO THIS.

YOURS TRULY

ES

507

1310

RECEIVED

03 SEP 30 PM 12:14

OFFICE OF THE
EXECUTIVE SECRETARIAT

September 26, 2003

Gail Norton
Secretary of the Interior

Fax: 202-208-6956

Re: Congresswoman Woosley bill #HR2656

Gail:

I am writing in regard to the casino project currently being discussed in Rohnert Park California.

On behalf of myself, my husband and my three daughters who live in the area proposed for this casino, I am asking for your help in stopping this project. My family lives in the country and moved here for a chance to raise our girls in a healthy, happy environment. We want swingsets not slot machines in our backyard.

The traffic on the frontage road is unbelievable and should this casino be built it will be a living nightmare. My family will be subjected to increased crime, increased traffic, a major decrease in water quality, the environmental impact on the land surrounding my home will be unbearable and unhealthy for my family. My heart breaks thinking that I have done everything in my power to give my girls a wonderful childhood and now it can all be taken away without any concern for the citizens directly affected.

Knowing that people can drink 24 hours a day and then get into a car and drive down my street is every parents biggest fear – how can I keep my girls safe in this environment. The local officials here in Rohnert Park don't seem to care - We are asking you as parents and very concerned citizens to help us stop this project – our children are our future and we need to protect them with everything we have.

Many Thanks

Julie & Sally Begley

Julie & Sally Begley
815 Scenic Ave
Santa Rosa, CA 95407
707-585-0538

SWM

ES 508

Suni Warcloud Montgomery
1521 Sarkesian Drive ~ Petaluma, California 94954-4408

RECEIVED
03 SEP 30 PM 12: 15
OFFICE OF THE
EXECUTIVE SECRETARIAT

Honorable Gale Norton, Secretary of the Interior
United States Department of the Interior
1849 "C" Street, NW
Washington, DC 20240

694214

re: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

Dear Secretary Norton:

I am writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by the Federated Indians of the Graton Rancheria, and to express my support for HR2656. The Federated Indians of Graton Rancheria plan to use the site for a huge, Las Vegas-style casino. This is not a "reservation"; it is a commercial development which would never be allowed to be built in this community on this land under any other circumstances. The tribe has so much money behind it from Las Vegas developers (Station Casinos) and local developers (Kenwood Investments), and our state government officials receive so much money from Indian gaming that people like me have nowhere to go to stop a project like this.

The proposed casino site is an Agricultural Preserve area and important Vernal Wetlands. It is habitat to endangered California species and provides food and nesting areas for migrating waterbirds in the Spring. It is a flood plain and drainage system for the County. It is also a groundwater recharge area designated by the State of California.

We have all just learned in yesterday's paper that Sonoma County's water supply is bankrupt, and that there is *no* additional water for new projects. The Tribe plans to sink multiple1,000 to 2,000 foot wells, but the aquifer in this area is already in a negative recharge situation. This casino will pump millions of gallons of water each day, and could dry up private wells that are the only water supply for nearby homes.

We have had serious traffic problems on Highway 101 for decades, and this project is supposed to bring 20,000 additional cars each day, twenty-four hours a day. Highway 101 can't take that additional traffic, nor can the surface streets.

Rohnert Park is also a college town, and I don't believe that a casino is an appropriate business to have in a town with so many young people in it. Casinos do attract crime and drugs wherever they are located. A casino would forever change this whole area for the worse.

Las Vegas gambling interests are cynically abusing the Federal land trust system, put into place to help Native Americans secure property for homes, and they will profit directly from this misuse of the Federal trust system. We can't fight Las Vegas money by ourselves. Please - help us keep this project out of our city.

Sincerely,

Suni Warcloud Montgomery

Marilee Taylor Montgomery
152 Wilfred Avenue, Santa Rosa, CA 95407

Honorable Gale Norton, Secretary of the Interior
United States Department of the Interior
1849 "C" Street, NW
Washington, DC 20240

FS

509

RECEIVED
03 SEP 30 PM 12: 15
OFFICE OF THE
EXECUTIVE SECRETARIAT

re: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

694215

Dear Secretary Norton:

I am writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by the Federated Indians of the Graton Rancheria, and to express my support for HR2656. The Federated Indians of Graton Rancheria plan to use the site not for homes, but for a sprawling Las Vegas-style casino with a 300 room hotel, spa, multiple restaurants, fast food franchises, a 2,000 seat entertainment venue and a 2,000 slot machine casino on 150-plus acres of 380 total acres immediately outside the Rohnert Park City Limits.

When the Federated Indians of Graton Rancheria petitioned the Federal government for tribal status, they promised that they would not seek to build a casino. Now, having lied to the government of the United States, they are asking you to declare their casino site a "reservation". This cynical abuse of a system put into place to help Native Americans secure property for homes is being bankrolled by Station Casinos Inc., a Las Vegas casino development consortium, which will profit directly from this misuse of the federal trust system.

The proposed casino site is designated in the Sonoma County General Plan as an Agricultural Preserve area, and is also Vernal Wetlands. It is adjacent to modest homes and dairy farms, and on the southern side, is immediately adjacent to a Senior Citizens' Mobile Home Park. These Vernal Wetlands are habitat to endangered California species and are an important resource for migrating water fowl each Spring. As a flood plain and drainage system for hundreds of square miles of the County, these Wetlands are an important flood control asset. They are a vital water replenishment system for the Santa Rosa Plain Aquifer, which is already seriously depleted.

Because there is no additional water capacity within the Sonoma County Water Agency, the Tribe plans to sink multiple 1,000 to 2,000 foot wells for this project. The City of Rohnert Park was successfully sued in 1999 for pumping too much groundwater from City wells, causing the surrounding area's private wells to run dry. This casino will need millions of gallons of water per day. Recycling used water for irrigation or toilets will not soften the impact on the aquifer; eventually the wells will suck outward, thus, affecting private wells that are the only water supply for nearby homes.

The sewage capacity of the Santa Rosa sub-regional system is already undersized . Much of the capacity for the growth of the county and cities that is dependent on our sub-regional system could be used up by this single project, leaving none for the current or future needs of the community at large.

The impact of the proposed casino on the social, economic and natural resources of this area is beyond definition. The Highway 101 corridor, already in serious trouble, is not equipped to handle the traffic that this project would generate, nor are the two-lane rural roads flanked by homes that would be the points of entry to the casino. Families, including my own, would be displaced from their homes by the road-widening that would be necessary for the project.

It is time for the Federal government to put a stop to the abuse of the federal land trust system, and prevent Las Vegas interests from further exploiting the process. Further, this site is inappropriate for commercial development in general and for a large casino in particular.

Please - withhold reservation status for this site!

Very truly yours,

M. Taylor Montgomery

Marilee Taylor Montgomery

697191

Stop the Casino 101 Coalition

Sonoma County, California
www.stopthecasino101.com

re: **Graton Rancheria casino**

FOR IMMEDIATE RELEASE:
November 21, 2003: 6:00 a .m.

CONTACT: Marilee Montgomery
707-588-9926

RECEIVED
03 NOV 24 P12:1
OFFICE OF THE
EXECUTIVE SECRETARY

ROHNERT PARK CITY COUNCIL RECALL EFFORT READY FOR NEXT STEP

ROHNERT PARK, CA: Rohnert Park's Recall effort is ready to move forward. On Monday, November 24, volunteers consisting of Rohnert Park residents will begin going door-to-door and setting up in shopping centers city-wide to gather the 3,700 signatures needed to put the Recall on next Spring's ballot. Retired engineer Larry Resnick has spearheaded the Recall campaign, which began last Summer, shortly after it was learned that Rohnert Park's City Council had conducted secret meetings with casino interests for two and a half months before the public was finally informed.

"They've had to learn as they go, but Larry Resnick and everyone helping him with the Recall did not give up", said Chip Worthington, whose group Stop the Casino 101 Coalition supports the Recall. "Their perseverance clearly shows how serious this Recall effort is. The City Council has not expressed the will of the people. We think it will be a fairly simple task to get the required signatures".

Recently, volunteers collecting signatures for a Referendum to overturn the City's agreement with the casino were able to gather 2,600 signatures in only two weeks. The Recall has 120 days to collect the 3,700 signatures, which is 20% or Rohnert Park's registered voters.

The Recall targets four of the five Rohnert Park City Council members; only Councilman Jake Mackenzie has been spared. Mr. MacKenzie, who had envisioned a much smaller project in a commercially-zoned part of town, was so appalled by the location and size of the proposed casino that he refused to support it. Recall supporters indicate that five or six excellent replacement candidates are waiting in the wings, and will run if the Recall goes on the ballot.

Although Rohnert Park Mayor Armando Flores has stated that opposition to the casino is from a "small group", documents obtained from the City under California's Public Records Act show that letters to the City Council in August ran more than 20 to 1 opposed to the casino. Many of those letters were apparently also sent to Senator Dianne Feinstein, who thus far has failed to

speak on the community's behalf as she did for the original casino site on Lakeville Highway, something that has also angered her constituents in and around Rohnert Park.

If rumors of a Republican plan to target Senator Feinstein's seat are true, it's unclear how much support the Senator may have lost in this community over this issue; Sonoma County's Republican Party saw an increase of over 5,000 members this past year, the largest increase of registered Republicans in any county in California.

In the recall election that put Arnold Schwarzenegger in office, Sonoma County voters favored Democrat Cruz Bustamonte by just one percentage point. Bustamonte garnered 40% of the vote, while Schwarzenegger gathered 39% of the vote in a county dominated by Democrats. Many feel Schwarzenegger's strong showing here was a direct result of the casino issue, and that this issue may continue to play a role in county politics in the future.

END

Peter Z. Jackson

152 Wilfred Avenue
Santa Rosa, California 95407

25

510

September 28, 2003

RECEIVED
03 SEP 30 PM 12: 15
OFFICE OF THE
EXECUTIVE SECRETARIAT

Honorable Gale Norton, Secretary of the Interior
United States Department of the Interior 694213
1849 "C" Street, NW
Washington, DC 20240

re: Federated Indians of Graton Rancheria Rohnert Park, CA casino site

Dear Secretary Norton:

I am writing to urge you to deny reservation status for the Rohnert Park, CA casino site proposed by the Federated Indians of the Graton Rancheria, and to express my support for the legislation proposed by Lynne Woolsey and Dianne Feinstein. The Federated Indians of Graton Rancheria don't want a place to build their homes and raise their families. They want to cash in by using the federal land into trust system to build a huge casino on land that Sonoma County voters have designated as Agricultural Preserve. Nobody would be allowed to build this kind of project here, and I don't think that this tribe should be allowed to build it, either.

The members of this tribe are *not* a disenfranchised, downtrodden group living in shanty houses; they are everyday citizens who have been working and living in the community at large for generations. But thanks to the raptors from Las Vegas, the tribe has so much money behind it from Station Casinos that stopping this project is like trying to stop a juggernaut; we're just getting rolled over and flattened. Our state government officials from Gray Davis to Joe Nation receive so much money from Indian gaming that I, a life-long Democrat, am voting in the recall election for Arnold Schwarzenegger, who promises to stop this abuse.

My house would be only 100 yards from this casino, and most casinos in California have proved to be bad neighbors. I've lived here for twenty-five years, and planned to stay here until I died, but in all probability, I would have to sell my house to escape the noise, traffic, and crime that would invade our peaceful rural neighborhood if this casino is built.

We all voted, tribal members included, for a County General Plan that saved this whole area for agriculture. What is the point of community planning if the federal government allows instant tribes to go reservation shopping in order to build these giant casinos with all their attendant problems? Las Vegas has found a bonanza in this situation, and is exploiting the federal process for their own profit, at the expense of the communities in which these casinos are built.

We have serious water problems here, and I don't want to risk losing my well or losing our water rights to the tribe. We have bad traffic problems, and I don't think the tribe has enough money or will give any money - since typically, they haven't - to mitigate the traffic impact.

Please, do not allow this Rohnert Park site to be taken into trust. Don't let Las Vegas into our home town.

Sincerely, Peter Z Jackson

Peter Z. Jackson

COUNTY OF SONOMA
BOARD OF SUPERVISORS
575 ADMINISTRATION DRIVE, RM. 100A
SANTA ROSA, CALIFORNIA 95403

(707) 565-2241
FAX (707) 565-3778

EEVE T. LEWIS
COUNTY CLERK

511

MEMBERS OF THE BOARD

PAUL L. KELLEY
CHAIRMAN

MIKE REILLY
VICE CHAIRMAN

VALERIE BROWN

MIKE KERNS

TIM SMITH

December 1, 2003

Ms. Aurene Martin
Assistant Secretary of Indian Affairs
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D. C. 20240

Dear Assistant Secretary Martin:

Enclosed is the Resolution passed by the Board of Supervisors of the County of Sonoma, State of California, opposing the proposal by Stations Casinos and Graton Rancheria to develop a casino adjacent to Rohnert Park and opposing other gaming facilities inconsistent with the County's General Plan.

While we understand that recognized Native American tribes have tribal sovereignty, we also recognize the need for the county to protect its communities from the impact of large-scale development that often comes with Indian gaming.

We would greatly appreciate your considering our concerns and those of the residents of Sonoma County.

Sincerely,

Paul L. Kelley

PAUL L. KELLEY, Chair
Sonoma County Board of Supervisors

PLK:br:14885

Enclosure

ATTEST: OCT 21 2003

EDYE T. LEWIS
County Clerk & ex-officio Clerk of the Board of Supervisors of the State of California, in & for the County of Sonoma.
By _____ Deputy

#28

RESOLUTION NO. 03-1100

Date: October 21, 2003

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SONOMA, STATE OF CALIFORNIA, OPPOSING THE PROPOSAL BY STATIONS CASINOS AND GRATON RANCHERIA TO DEVELOP A CASINO ADJACENT TO ROHNERT PARK AND OPPOSING OTHER GAMING FACILITIES INCONSISTENT WITH THE GENERAL PLAN

WHEREAS, the Federated Indians of Graton Rancheria, a federally recognized Indian tribe ("Tribe"), and Stations Casinos, a Nevada Corporation, have proposed to build a major casino and resort on agricultural and community separator lands in the unincorporated area adjacent to the City of Rohnert Park; and

WHEREAS, the proposal is inconsistent with the County General Plan, located in a community separator zone, outside Rohnert Park's Urban Growth Boundary, and within the Laguna de Santa Rosa's flood plain; and

WHEREAS, the General Plan was the subject of analysis in an extensive public review process and Environmental Impact Report which was approved by the Board of Supervisors and is intended to guide decisions on future growth, development and conservation of resources; and

WHEREAS, once the federal government takes land into trust on behalf of the Tribe, the Tribe has the legal authority to preempt land use controls and safeguards contained in various laws and regulations including the County's General Plan and the California Environmental Quality Act, which are intended to assure that land uses contrary to the community health, safety, and general welfare are avoided and environmental impacts mitigated; and

WHEREAS, the Tribe was restored by an Act of Congress in December, 2000, based in part on its promise not to engage in casino gaming; and

WHEREAS, the federal legislation restoring the Tribe contains language that could be used to circumvent the normally required environmental review and administrative process for taking land into trust by the United States government for the benefit of the Tribe; and

WHEREAS, under existing federal requirements, there is not any effective coordination of gaming proposals or other major tribal enterprises to examine either the cumulative impacts of these disparate projects or consistency with the General Plan; and

WHEREAS, large tribal gaming projects will impact local and regional public infrastructure, including highways, streets, transit systems, water, wastewater, energy systems and resources, affordable housing and emergency services, both built and yet to be built; and

WHEREAS, without appropriate mitigation, the proposed developments will have substantial off-reservation negative environmental impacts and place substantial burdens on the public infrastructure which otherwise must be borne by County taxpayers, residents, visitors and businesses; and

WHEREAS, rapid construction of tribal gaming facilities throughout California have caused local governments to experience serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, to date, the conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow intense development of lands not previously held in trust, without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal casinos and the State has not effectively sought redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties, with the input of Sonoma County, adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, Station Casinos and the Tribe have an agreement to purchase

approximately 360 acres of agricultural and community separator land west of Rohnert Park and intend to place the land into trust for the purposes of casino development - including an extensive gaming complex, with a 300 room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services; and

WHEREAS, a thorough environmental review has not been conducted on the project but preliminary information indicates that the proposed casino could overwhelm Highway 101 capacity by generating 12,000 to 15,000 additional trips per day, and will delay the Wilfred Avenue interchange project which has been funded by the State; and

WHEREAS, the proposed casino project will have other currently undetermined local and regional fiscal, environmental and social impacts; and

WHEREAS, the proposed Graton Tribe casino proposal is neither subject to a thorough CEQA-like process that identifies fiscal and environmental impacts that are then mitigated by the Graton Tribe, nor administrative consideration by the Department of the Interior to determine if the use of this land will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the Tribe.

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors supports revisions in federal law to require that all tribal trust applications are subject to discretionary review by the Secretary of the Interior to ensure that they meet all regulatory criteria for acceptance of property into trust and that any proposed trust land intended for Indian gaming satisfy the two part test contained in 25 U.S.C. §2719 (b).

BE IT FURTHER RESOLVED that the Board of Supervisors opposes the development of a casino on the proposed site adjacent to Rohnert Park.

BE IT FURTHER RESOLVED that Board of Supervisors opposes the creation of a gambling casino resort on any site that is inconsistent with the General Plan.

Supervisors:

Brown no Kerns ave Smith aye Reilly ave Kelley ave

Ayes 4 Noes 1 Abstain 0 Absent 0

SO ORDERED.

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name Glen Wiemeyer

Address 2621 Knob Hill Dr. Santa Rosa CA

Signature Glen Wiemeyer

Date 9/8/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR + MRS DAVID GEMROTH

Name Barbara Gemroth

Address 1855 Tonja Way - Santa Rosa CA 95401

Signature Barbara Gemroth

Date 9/8/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name SANFORD THEODORE

Address 2423 ROLPINE CT. SANTA ROSA, CA 95403

Signature Sanford M. Theodore

Date SEPTEMBER 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name Joe Wayt

Address 3815 Primrose Ave, Santa Rosa, CA 95407

Signature Joe Wayt

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name Allen A. Foust

Address 2078 Tokay St Santa Rosa, Ca. 95404

Signature Allen A Foust

Date Sept. 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name Steven G. Cavalli

Address 435 Denton Wy. Santa Rosa, Calif 95401

Signature Steven G Cavalli

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name JOHN COSSEY

Address 3249 GUERNEVILLE RD. SANTA ROSA, CA. 95401

Signature John R Cossey

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr & Mrs

Name William W. Funk

Address 880 Santa Ana Dr Santa Rosa Cal 95404

Signature William W. Funk Jr.

Date Sept 7/03

880 Santa Ana Drive Santa Rosa CA 95404

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name Sam Tillery

Address 3954 Primrose Ave. Santa Rosa, CA 95407

Signature Sam Tillery

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Virginia Johnson

Address P.O. Box 1486 Middletown CA 95461

Signature Virginia Johnson

Date 9/2/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name IRENE LOSEE

Address 131 11th St. SANTA ROSA Calif 95401

Signature Irene Losee

Date Sept. 7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name RYAN J JACKSON

Address 2082 MT Olive WAY SANTA ROSA Calif, 95404,

Signature Ryan J Jackson

Date 9/09/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Betty J. Stone R.N

Address 3257 Guerneville Rd. Santa Rosa Ca 95401

Signature Betty J Stone R.N.

Date Sept 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name MARK A. STONE

Address 576 COURTYARD CIRCLE SANTA ROSA, CA 95407

Signature Mark A Stone

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Gloria D Haug

Address 90 Charro Pl, Santa Rosa, CA 95401

Signature Gloria D Haug

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr & Mrs

Name Ed McCrummen

Address 455 Jose Ramon S. Rosa CA. 95401
Santa

Signature Edwin McCrummen

Date 9/8/03.

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Isabel Solis

Address 2397 Whitewood Dr, Santa Rosa, CA

Signature Isabel Solis

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Dawn McDonald

Address 2420 Edgewater Dr. Apt. 17 Santa Rosa 95407

Signature Dawn McDonald

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Amy Withington

Address [illegible] San Bonaventura Dr Santa Rosa, CA

Signature [illegible]

Date 9.7.03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Marjorie Huddleston

Address 40 CARDINAL WAY, SANTA ROSA CA

Signature Marjorie Huddleston

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Bruce Broemmel

Address 413 Corte Pintado Rohnert Park, CA 94928

Signature Bruce Broemmel

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Sheree Woods

Address 2048 Gambels Way Santa Rosa CA 95403

Signature Sheree Woods

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name KAREN M HOFFMAN

Address 518 Jackson Dr - Santa Rosa, CA 95409

Signature Karen M Hoffman

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name LYNNÉE BENTO

Address 920 Lytton Springs Rd Healdsburg CA

Signature Lynnée Bento

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name LINDA HANSEN

Address 925 W. STARBURST CT, WINDSOR, CA

Signature L Hansen

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Terri Durham

Address 442 Alta Ave Rohnert Park, Ca

Signature Terri Durham

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Virginia Maynard

Address 1619 Glenbrook Dr Santa Rosa, Ca. 95401

Signature Virginia Maynard

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name THERESA M Kocheover

Address P.O. Box 1486 - Middletown, Ca. 95461

Signature Theresa M Kocheover

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Kathleen Corsiglia

Address 2117 Contra Costa S R Ca 95405

Signature Kathleen Corsiglia

Date Sept 7 03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Nathan Nichols

Address 2575 mark west station Rd, Windsor CA 95492

Signature

Date 09/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Pattie McAlexander

Address 2802 Yulupa AVE. Santa Rosa, CA. 95405

Signature Pattie McAlexander

Date Sept. 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Janice E. Kainuma

Address 2430 Murdock Drive
Santa Rosa, CA 95404

Signature Janice E. Kainuma

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Ann Marie Lewis LEWIS

Address 2300 Waltzer Rd. #17 Santa Rosa, CA

Signature Ann Lewis

Date 09-08-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C. 545.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Corey Johnsen

Address 620 G st #1 Petaluma Ca 94952

Signature Johnsen

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Miguel Vazquez

Address 1701 E Cotati Avenue Rohnert Park, CA

Signature Miguel Vazquez

Date 09-07-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name MANUEL SEPTIMO

Address 1700A Glen Brook Dr. SR. CA. 95403

Signature Manuel Septimo

Date Sept. 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Jason T. Lowry

Address 512 Racquet Club Cir, Rohnert Park CA 94928

Signature [illegible]

Date 9-7-03

Jim Crowhurst
3219 Franz Valley Road
Santa Rosa, CA 95404

No Casino in Rohnert Park

Jim Crowhurst

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name LARRY BARSI

Address 4800 RINCONADA DR S.R. CA 95409

Signature

Date 9/7/03

BY FACSIMILE (202) 456-1907

Date: 1 Sept 03

The Honorable George W. Bush
President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Andrew Card, Jr.

RE: STOP the Graton Rancheria CASINO Project

Dear President Bush,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

Signed: Mrs. James English

Address: 1047 Rancho Lindo Dr Petaluma Ca

Phone: 707-763-1201

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR + MRS

Name DAVID L. ENGLISH

Address 528 LACROSSE CT., ROHNERT PARK, CA. 94928

Signature

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Yvette Link

Address 628 Mill Street Santa Rosa, Ca. 95404

Signature Yvette Denise Link

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name William H Low and Family

Address 3715 Crestview Dr Santa Rosa, CA 95403

Signature William H Low

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. + Mrs.

Name MARK C. Dedekam

Address 733 Barry Ct., Rohnert Park, Ca. 94928

Signature Mark C. Dedekam

Date Sept. 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name BETTY L. FURR

Address 6755 CAROL DR SEBASTOPOL CA 95472

Signature Betty L Furr

Date 9.7.03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. and Mrs.

Name John C Camos

Address 5416 El Mercado Pkwy Santa Rosa Ca 95403

Signature

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Cynthia Jones

Address 5273 Dry Creek Healdsburg, Ca

Signature [illegible]

Date 9/7/2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Ann Johnston

Address 801 Hurlbut Ave. Sebastopol CA

Signature Ann Johnston

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR + MRS

Name Jeremy Pisanic

Address 1055 W. College Ave #106 Santa Rosa CA 95401

Signature

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Oliver R. Perry

Address 1929 Bodie ST / SANTA ROSA, CA 95401

Signature Oliver R. Perry

Date 9/1/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Barry Perilli

Address 1926 Dennis Ln, Santa Rosa, CA 95403

Signature Barry Perilli

Date Sept 5, 03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name David Parsons

Address 439 Shannon Wy, Windsor Ca. 95492

Signature [illegible]

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Angela Vance

Address 217 ALLEB DR. SANTA ROSA CA 95405

Signature

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Cindy Vacco

Address 795 Ferguson Rd (PO Box 2103 Sb CA 95473)

Signature Cynthia H. Vacco

Date 9-7-03

BY FACSIMILE (202) 456-7044

Date: 7 Sept 03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

Signed: Betty Schneider

Address: 1280 Pendleton Dr, Petaluma, Ca. 94954

Phone: 707-763-2784

C:\My Documents\www\ProUsa's Stuff\Political Action\No Casino\Cheney-Blank

BY FACSIMILE (202) 456-7044

Date: Sept 7/03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

Signed: Linda Schneider

Address: 535 Elysian Ave, Penngrove, CA 94951

Phone: (707) 795-0641

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Bert Schuldt

Address P.O. Box 3772 Santa Rosa 95402

Signature Bert J. Schuldt

Date 07 Sept 03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Max Devlin-Schuldt

Address 6190 Marsi St Windsor, Ca

Signature Max Devlin-Schuldt

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Elizabeth A. See

Address 7461 Mirabel Rd. Forestville, CA 95436

Signature Elizabeth A See

Date Sept 7, 03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name EDMUND A SMITH

Address 1200 SUNRAY CT WINDSOR CA.

Signature Edmund A Smith 95492

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Me + Mrs

Name Jarrod Suarez

Address 6899 Montecito Blvd #34 Santa Rosa CA. 95409

Signature Jarrod Suarez

Date Sept. 6. 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name D Scott Smith

Address 1332 Zachary Place Santa Rosa CA. 95409

Signature [illegible]

Date 09/07/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Donna Simnick

Address 709 Link Ln, Santa Rosa, CA 95401

Signature Donna Simnick

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name Caleb Skandera

Address 122 Scott St., Santa Rosa, CA 95401

Signature [illegible]

Date 9/8/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR + MRS.
Name Harry L. Skandera

Address 3150 Hoen Ave. Santa Rosa, Ca. 95405

Signature Harry L. Skandera

Date 5 Sept. 03

My name is (Print) Julie D Neilsen

I live at 410 Arlen dr. RP Ca 94928

My telephone # is 707 - 793 - 0337

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature [signature] Date 9-6-03

Honorable Dick Cheney
Vice President of the United States
White House
1600 Pennsylvania Avenue
Washington, DC

c/o Lewis "Scooter" Libby,

Dear Vice President Cheney,

Please do whatever you can to help stop the building of the casino in Rohnert Park, CA. Rohnert Park is our neighboring community, and we do not want Indian gaming and the associated trouble it brings to a community.

We are writing you because we understand that there must be some sort of Federal permission given for the casino to be built on land that was not previously the reservation's land.

Thank you for your assistance in this matter.

Sincerely,

Suzanne Danford
2440 Redpine Court
Santa Rosa, CA 95403

Ann Coset
2431 Redpine Ct.
Santa Rosa, CA
95403

Ann Coset

Dear Vice-President Cheney,

Please do not allow the building of a casino in the neighboring town of Rohnert Park, CA.

Ann Coset

580,

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR. + MRS

Name Harold Luman HAROLD W LUMAN

Address 17 ASCOT DR SANTA ROSA CA 95403

Signature Harold W Luman

Date 8/05/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

MR + MRS

Name Peter Fiss

Address 1708 Wright Str, Santa Rosa, CA 95404

Signature [illegible]

Date Sept 5, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

JESUS G. ANDRADE

MR + MRS JESUS G. ANDRADE

Name Jesus G. Andrade

Address 117 SEQUOIA CIRCLE SANTA ROSA, CA 95401

Signature Jesus G. Andrade

Date 8/5/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Clare L. Campbell

Address 782A Millbrae Ave., Santa Rosa, CA 95407

Signature Clare L. Campbell

Date Sept. 8th, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name DENNIS AZEVEDO

Address 235 SEXTON Rd. SEBASTOPOL, CA. 95472

Signature Dennis Azevedo

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Michael & Angela Abegglen

Address 573 Racquet Club Circle, R.P. CA. 94928

Signature [illegible] Angela Abegglen

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Emily E. Herrington, Jason D. Herrington

Address 154 Esmond Cir. Windsor, CA 95492

Signature Emily Herrington, Jason D Herrington

Date 9/6/03 9/6/2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Kathryn S. Heywood

Address 8955 Oakmont Dr., Santa Rosa, CA 95409

Signature Kathryn S. Heywood

Date Sept. 6, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

HARGROVE

Name Steven Hargrove

Address 1655 Beaver St. Santa Rosa CA 95404

Signature Hargrove

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Mike HYDE

Address 3005 Parnell RD, Fulton Ca 95439

Signature Mike Hyde

Date 9-6-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Linda A. Hanson and Family

Address 983 Laguna Vista Rd., Santa Rosa, CA 95401

Signature Linda A. Hanson

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. + Mrs.

Name Loren Matthias

Address 476 Flower Ave - Santa Rosa, Ca

Signature Loren Matthias

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. + Mrs

Name David Melling

Address 503 Anson Ave Rohnert Park, CA 94928

Signature David Melling

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Karen McGlennon

Address 9959 Bodega Hwy Sebastopol CA 95472

Signature Karen R McGlennon

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Ken McGrath

Address 221 Chablis WAY Cloverdale CA.

Signature Ken McGrath.

Date 9.7.03

BY FACSIMILE (202) 456-7044

Date: 9-7-03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

LYN MARRINER

Signed: Lyn Marriner

Address: 482 Liberty Rd Petaluma, CA 94952

Phone: 707-328-0634

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Suzanne Toney

Address 319 Laurel St., Santa Rosa, CA 95401

Signature Suzanne Toney

Date 9/8/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name EVELYN R. TAYLOR

Address 11170 BODEGA Hwy, SEBASTOPOL, CA 95472

Signature Evelyn R Taylor

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Donna M Thommarson

Address 241 Felicidad Ct, Santa Rosa, CA 95401

Signature Donna M Thommarson

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name JACK TRAUGHBER

Address 2830 Sioux St Santa Rosa

Signature Jack Traugher

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name TROY D. NEWTON

Address 2349 MANDARIN LN. SANTA ROSA, CA 95401

Signature Troy D Newton

Date 9/5/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Lloyd Noble

Address 626 Lombard Ave Santa Rosa CA

Signature

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name June Irwin

Address 282 Cir. San Lucas R.P., California

Signature June Irwin

Date 9-6-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Michael Romano

Address 1317 Eardley Ave Santa Rosa CA 95401

Signature Michael Romano

Date 9-6-03

BY FACSIMILE (202) 456-7044

Date: 9-7-03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

JEANNETTE BREAUX

Signed: Jeannette Breaux

Address: 425 8th Street, Petaluma, CA 94952

Phone: 707 / 762-9017

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Kathleen Marie Bishop

Address 2482 Big Oak DR Santa Rosa CA 95401

Signature Kathleen Bishop

Date September 7, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name CATHERINE BARNARD

Address 626 LOMBARD SANTA ROSA CA

Signature Catherine Barnard

Date 9/7/03

BY FACSIMILE (202) 456-7044

Date: 9-7-03

The Honorable Dick Cheney
Vice President of the United States
The White House, 1600 Pennsylvania Avenue
Washington, D.C.
In care of Chief of Staff, Lewis "Scooter" Libby

RE: STOP the Graton Rancheria CASINO Project

Dear Vice President Cheney,

I OPPOSE the casino project for the Rohnert Park, California area. Please do all you can to STOP this process. It will hurt families.

Thank you very much for your kind attention.

Sincerely,

Signed: Aaron Kruse and Family

Address: 492 Liberty Rd. Petaluma Ca 94952

Phone: 707-763-4584

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Anne Glanville and Family.

Address 1736 Bollinger Lane, Sebastopol, CA 95472

Signature Anne M Glanville

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Margaret Grayson

Address 2347 Wicket, Santa Rosa, CA 95403

Signature M Grayson

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Stan Goodell

Address 2327 Vennie Court

Signature Stan Goodell

Date 9/7/2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name REX H. GEORGE

Address 5386 GOLD DRIVE, SANTA ROSA, CA 95409

Signature Rex H. George Jr

Date 7 SEP 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name ERNIE GOLLA

Address 4520 Old Redwood Hwy. Santa Rosa CA

Signature [illegible]

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs.

Name Steve Gilbertson

Address 412 Shannon Way, Windsor CA 95492

Signature Steve Gilbertson

Date 9-5-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name Mike Gibson

WIKIUP

Address 163 Wikiup Meadows Dr SANTA ROSA CA 94928

Signature Mike Gibson

Date 9-7-03

Honorable George W. Bush, President of the United States
White House 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Andrew Card, Jr.
Fax #202-456-1907

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Carla M Clark

Address 1009 Clover Ln Santa Rosa Ca 95401

Signature Carla M Clark

Date 9/10/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Wm. E. Cornell, Jr., CPA

Address ~~1101 College Ave. Ste 210~~ Santa Rosa, CA 95404

Signature William E. Cornell Jr

Date Sept 8, 2003

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr + Mrs

Name David Chilconess

Address 5665 Raters Dr - Santa Rosa, CA 95409

Signature [illegible]

Date 9/5/03

To →

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

From →

Name Kathy Cia

Address 781 E. Cotati Ave #H-4 - Rohnert Park, CA. 94928

Signature Kathy Cia

Date 9/6/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name ROBERT CEINAR

Address 8541 SHADETREE DR. WINDSOR CA. 95492

Signature Robert Ceinar

Date 9-6-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Diane Hogrefe

Address 1137 Putney Dr Santa Rosa CA 95401

Signature [illegible]

Date 9/7/2003

Can you please do something to intervene?

Thank you

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name James Weber

Address 912 Keegan Drive Santa Rosa, CA 95407

Signature James A. Weber

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name heather warner

Address 2115 Kawana springs rd #1305
santa rosa, CA 95404

Signature heather warner

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Connie Wiemeyer

Address 5499 Carriage Ln SR 95405

Signature Connie Wiemeyer

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name Eleanor C. Wiemayer

Address 3802 Chanate Rd, Santa Rosa, Ca 95404

Signature Eleanor C. Wiemayer

Date 9/7/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Name JOHN WOODRUFF and family

Address 1967 Green hill Rd. Sebastopol CA.

Signature

Date 9/6/03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. + Mrs.

Name TREVOR Micheal Ward

Address 6115 Blank Rd. Sebastapol, CA

Signature Trevor M. Ward

Date 9-7-03

Honorable Dick Cheney, Vice President of the United States
White House, 1600 Pennsylvania Avenue, Washington D.C.
c/o Chief of Staff, Lewis "Scooter" Libby
Fax #202-456-7044 or Fax #202-456-2710

I STRONGLY OPPOSE THE PROPOSED CASINO IN ROHNERT PARK, CALIFORNIA

Mr. + Mrs.

Name Randy S. Wetch

Address 4060 Blank Rd. Sebastopol, CA 95472

Signature Randy S. Wetch

Date 9-7-03

Stop the Casino 101 Coalition

Sonoma County, California
www.stopthecasino101.com

FOR IMMEDIATE RELEASE: **CONTACT: Marilee Montgomery**

December 10, 2003: 9:00 a.m. **707-588-9926**

FEDERALLY-PROTECTED CALIFORNIA TIGER SALAMANDER FOUND NEXT TO PROPOSED ROHNERT PARK CASINO SITE:

HIGHLY-ENDANGERED CREATURE IS A RARE FIND

ROHNERT PARK, CA: On the morning of November 29, 2003, a local expert literally stumbled across an adult California Tiger Salamander immediately adjacent to the site of the proposed Rohnert Park casino. According to Al Wolf of Sonoma County Reptile Rescue, he and an associate, Jon Siefer, were driving south on Stony Point Road near Rohnert Park Expressway, when they spotted the salamander in the road, heading in the direction of the casino site. Wolf and his associate stopped their car, and moved the salamander safely off the road.

Mr. Wolf, who has studied reptiles and amphibians in Sonoma and Marin County for over thirty years and has worked with California Fish and Game and other wildlife groups, brought this incident to the attention of pro-community groups who are trying to ward off development of the site now threatened with a sprawling Las Vegas style casino. The site, which has been farmed for years, is in reality a Vernal Wetlands, essential to amphibian reproduction and to migrating waterfowl.

Mr. Wolf, who opposes building a casino on this "environmentally sensitive land" said this find shows that the federally-protected California Tiger Salamander "appears to live in the area of the proposed casino". Tiger Salamanders throughout California are highly-endangered, but Sonoma County's population of Tiger Salamander is especially so as a result of lost and fragmented habitat. The proposed casino would destroy even more habitat, making it less likely that this animal will be able to survive as a population group.

In all probability, the adult salamander that was rescued from the road had just come out of hibernation to feed and migrate toward a vernal pool to breed; recent rains had already caused these pools to form throughout the casino site. Amphibians like the California Tiger Salamander, and including frogs and toads, thrive in the vernal pools, as there are no fish to eat their eggs or their young.

Experts have agreed for decades that amphibians serve as barometers of the health of an environment. They are essential to insect control and to the survival of the wildlife that feeds on them, such as the egrets that have already returned to the casino site where they will be found throughout the Winter and Spring.

END

November 30, 2003
2310 Cross Avenue
Santa Rosa, CA 95401

Honorable Gale Norton, Secretary of the Interior
Washington, D.C.

Dear Secretary Norton,

Thank you for your hard work on behalf of Americans. Please stop the Graton Pomo Indians from building a huge casino and hotel in the green belt separating Rohnert Park and Santa Rosa, California. When Californians voted to approve Indian gaming we were led to believe that the casinos would be built on Indian land, not in communities inhabited by the general population.

If this casino and hotel are built it will deplete the ground water that dozens of residences and a few dairies rely upon. It will also cause a traffic crisis effecting thousands of drivers along the highway 101 corridor. The intersection through which I get to work and just about everywhere else will become a nightmare.

This tribe promised Rep. Lynn Woolsey that they would not build a casino if she helped them regain their legal status as a tribe. Greed has motivated them to go back on their word. Sonoma County already has one casino, which has resulted in more traffic accidents on small country roads. Please stop this ill conceived plan before it ruins our community.

Sincerely,

Barrie Ann Mason, MA, MFT

130

630)

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

RECEIVED
03 DEC 15 PM 1:53
OFFICE OF THE
EXECUTIVE SECRETARIAT

698215

RE: Graton Rancheria Casino Proposal

Dear Secretary Norton,

The Federated Indians of Graton Rancheria Tribe are planning to build a resort casino in Rohnert Park, off of Highway 101. They plan to purchase 360 acres and place the casino on the Western borders of the city. If the casino is built, it will have a direct negative impact on the city and surrounding areas.

Rohnert Park is under legal obligations to monitor and limit water usage. If the casino is built, they will be allowed to use our water, but we would not be able to regulate their usage. This is because they are not considered to be part of our city or are they included in our water plans for Sonoma County. The casino would bring contaminates into our water supply through gas and oil runoffs from surrounding roads and their parking lots. They would also increase wastewater with the use of their restaurants and other services.

Another impact of the casino would be an increase in traffic. Highway 101 has only two lanes going into and out of Rohnert Park. If the casino were built many tourists, from all over the bay area, would travel to the casino causing traffic and more accidents. It is estimate that it will increase traffic flow 10,000 – 20,000 cars per day.

Crime levels will also increase if the casino is built. Rohnert Park has a very low level of crime and I would like to keep it that way. The casino would likely bring increased crime rates, prostitution, DUI related accidents and deaths, and gambling and alcohol addictions. I do not want to see my beautiful city destroyed by crime.

The Federated Indians of Graton Rancheria Tribe claim that their casino would be a wonderful addition to our city. They are planning to increase our local annual revenue $200 million over the next 20 years. They are planning to give $5 million every year to the police, fire, and other city services to help control the elevated levels of crime. Local schools are going to receive $1 million every year to help improve them. However, the truth is that none of this money would be needed if the casino were not being built. The extra money is being donated to the city as a compensation for all of the negative impacts the casino is going to bring. Also, the money is not nearly enough to make up for the damage it is going to bring to the citizens of the community.

I strongly urge you to not grant the Federated Indians of Graton Rancheria Tribe the Land into Trust. Granting them the trust would allow them to govern and operate as a sovereign nation.

They would be exempt from local and state taxes, regulations, and laws. I also suggest that you amend the State Bill S 1342 and the House Bill HR 2656 to require the Federated Indians of Graton Rancheria Tribe to meet the requirements of the Indian Gaming and Regulatory Act.

I thank you for your time and consideration.

Sincerely yours,

Alexandriah Johnson

130

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

RECEIVED
2003 DEC 16 P 1:31
EXECUTIVE SECRETARIAT

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

PLEASE REVIEW ALL OF THE FACTS BEFORE ANY DECISION IS MADE.

THANK YOU.

Jared D. Machgan
1009 Santa Cruz Way
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

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THANK YOU.

David C. Machgan
1009 Santa Cruz Way
Rohnert Park, Ca. 94928
September 25, 2003

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US Department Of the Interior
1849 C Street Northwest
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THANK YOU.

Jason D. Machgan, CPA
942 Eleanor Avenue
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
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I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

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THANK YOU.

Darlene Machgan

Darlene Machgan
1009 Santa Cruz Way
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

PLEASE REVIEW ALL OF THE FACTS BEFORE ANY DECISION IS MADE.

THANK YOU.

Name: CHUCK SETTERLAND

Address: 436 LINCOLN ST.

City, State, Zip: HEALDSBURG CA 95448

Signature: [signature]

Date: 9/27/03

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

PLEASE REVIEW ALL OF THE FACTS BEFORE ANY DECISION IS MADE.

THANK YOU.

Name: JANET SETTERLAND

Address: 436 LINCOLN ST.

City, State, Zip: HEALDSBURG, CA 95448

Signature: Janet Setterland

Date: 9/27/03

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

PLEASE REVIEW ALL OF THE FACTS BEFORE ANY DECISION IS MADE.

THANK YOU.

Rose Sell

Rose Sell
5301 Eunice Street
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

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THANK YOU.

Paul Zaft
5325 Eunice Street
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
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I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

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THANK YOU.

Mary Zaft
5325 Eunice Street
Rohnert Park, Ca. 94928
September 25, 2003

Aurene M. Martin
Assistant Secretary – Indian Affairs
US Department Of the Interior
1849 C Street Northwest
MS-414-MIB
Washington D. C., 20240
Fax # 202 -208-5320

I AM WRITING THIS TO YOU TO EXPRESS MY OPPOSTION TO THE PROPOSED CASINO IN ROHNERT PARK, CA.

PLEASE REVIEW ALL OF THE FACTS BEFORE ANY DECISION IS MADE.

THANK YOU.

Douglas W. Schmidt

Douglas W. Schmidt
5323 Eunice Street
Rohnert Park, Ca. 94928
September 25, 2003

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME ALBERT MONTTAPA.

ADDRESS 8008 Manchester Ave. Rohnert Park CA 94928.

SIGNATURE [illegible]

DATE 10/4/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME CHRISTA MANNING

ADDRESS PO BOX 2508

SIGNATURE Christa M Manning

DATE 9/27/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME John R. Pinheiro

ADDRESS 5040 Nature Ln. Sebastopol CA 95472

SIGNATURE

DATE 4 Oct 03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Ken Olson

ADDRESS 7061 Fellows Ln Sebastopol CA 95472

SIGNATURE Kenneth L Olson

DATE 10-4-03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Catherine L. Bryant

ADDRESS 1356 Mattice Ln. Rohnert Park CA 94928

SIGNATURE [illegible]

DATE 10/3/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME Kathy L. Pitt

ADDRESS 5277 Wendell LN. Sebastopol, Ca 95472

SIGNATURE Kathy L Pitt

DATE 10/4/03

HONORABLE DICK CHENEY, VICE PRESIDENT OF THE UNITED STATES WHITE HOUSE, 1600 PENNSYLVANIA AVENUE, WASHINGTON D.C.
C/O CHIEF OF STAFF, LEWIS "SCOOTER LIBBY"
FAX#202-456-7044 OR FAX#202-456-2710

I STRONGLY OPPOSE THE PROPOSED FEDERATED INDIANS OF GRATON RANCHERIAS PLAN TO BUILD A CASINO IN ROHNERT PARK. CA 95407

NAME David Sullivan

ADDRESS 734 Lindsay Ave, Rohnert Pk. Ca. 94928

SIGNATURE

DATE 10-4-03

Dear Sir 541 10-11-03

I am concerned about the moral condition of this country as a whole. I'm a Dad + Husband in a house hold of 6 total.

We are facing a proposed Las Vegas-style Gambling Casino being built at the edge of town, Rohnert Park Calif. 94928. This project we are told has none of the normal controls concerning its construction due to the fact that it is on Indian land.

God has made us a promise in the Bible 2 CHRONICLES 7:13-14 It states

When I shut up the heavens so that there is no rain, or command locusts to devour the land or send a plague among my people, if my people, who are called by my name, will humble themselves and pray and seek my face and turn from their wicked ways, then will I hear from heaven and will forgive their sin and will heal their land.

Surely you are aware of all the plagues that are coming on this country.

I'm doing my best to raise my children to do what's right so that they will be prepared to help run this country in the future.

I do need help from your end to help change the laws to turn around the Casino business in this country.

My name is (Print) THOMAS J. STAHL

I live at 4 ARBOR CT, COTATI, CA. 94931

My telephone # is 707-664-0782

I am deeply concerned and distressed by my local government officials who say that they can do nothing about a proposed Las Vegas-style Gambling Casino that will be located on the edge of Rohnert Park, CA.

Rohnert Park is a quiet, family-friendly suburb. The majority of residents and neighbors do not want a gambling establishment that will allow 24hr alcoholic beverage service and all the other social, economic and infrastructure problems that a casino inevitably generates in their community.

The Rohnert Park City Council and our Sonoma County Board of Supervisors have told the residents that there is nothing that they can do to stop this from happening. These public officials refused to listen to the wishes of their constituents and are negotiating with the casino backers for monetary hand-outs that can, at any time, be refused in the future due to the casino backer's unique Sovereign Nation status.

The public officials say that the Federal Government will do nothing and have already decided to put the casino in my community with no say what so ever from the citizens. The public officials are being swayed with contributions and promises from the casino backers that even the public officials admit can not be legally enforced.

My own right to self-determination and right to self-government are threatened because these public officials have, against the wishes of the public, the majority of whom are against this project, invited and privately negotiated with the casino backers before there was any public input.

I believe that the City of Rohnert Park and Sonoma County officials are not telling the residents the truth about the "tribal and reservation status," are ignoring environmental concerns, severe water shortages, and their fiscal and social responsibility to the citizens of my community.

I ask that you NOT allow this casino into our community. It is not a benefit to me, my family, friends, and fellow residents when our right to self-determination and self-government is threatened by the casino backers who will have undue political power due to their Sovereign Nation status, campaign contributions and their non-binding promises of monetary compensation to my public officials and community.

Sincerely,

Signature _____ Date 10/12/03

I believe God is waiting on all of his people to do what ever they can during this time of judgement. Should we decide as a country to continue on the path we are headed with disreguard to God's laws, we will reap what we sow.

History does repeat itself because we refuse to learn from others mistakes. Wise men learn from others mistakes but fools don't.

During the Civil War Days the issue was slavery. The northerners who knew better paid the higher price than the southerners who saw no wrong. Check it out, it took 3 northerners to kill one southerner. When the issue was resolved the war came to an end.

Sincerely Mark A Lipsky

(707) 792-6880
8600 LANCASTER DR
ROHNERT PARK CA 94928

(649)

(138)

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03 OCT 28 AM

OFFICE OF
EXECUTIVE SEC

695811

1023 Santa Cruz Way
Rohnert Park, CA 94928
October 21, 2003

The Honorable Gale Norton
Secretary of the Interior
1849 C Street Northwest
Washington, DC 20240

Dear Madam Secretary:

As a citizen of Sonoma County and the city of Rohnert Park, I am very concerned that The Graton Rancheria Tribe is attempting to purchase a large parcel of land just East of Rohnert Park in order to erect a Casino and large Hotel. Up until they moved to purchase this piece of land it had been designated as open space between populated areas and is actually a flood plane.

Now with the construction projected, at least one quarter of this flood plane will be taken up with buildings or parking lots. I spoke before the County Supervisors meeting and twice at the Rohnert Park City Council. All act like they have no power to stop this Tribe's actions.

Something seems absolutely wrong. If a County is to meet its goals of land use and plan, I don't understand why a Tribe can move in, declare the land a sovereign nation and take over irrespective of any general plan or ecological issues. No private enterprise would be allowed to even consider building on this land.

I understand you have power to look into this plan for a Casino and pass judgement on their desire to use this wetland and ignore the needs of the citizens of the surrounding communities. Please do something. I am completely opposed to this Casino being place in the proposed position. Please take action, where apparently we citizens have no power and even our local governments respond with fear and trepidation.

Sincerely,

Alan F. Colton

Alan F. Colton

25 February 2004

Mr. Bill Allen
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Based on our conversation today concerning the NEPA Environmental Impact Statement process, would you please send me a CD-ROM copy of the Jamul Final EIS.

My thanks for your time and information.

Bill Gibson
770 Holly Ave.
Rohnert Park, CA 94928
707 696-3169

for Graton

Mailing list

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

February 21, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W.
9th Floor
Washington,
DC 20005

Dear Ms. Nagle;

As you may be aware, The Federated Indians of Graton Rancheria and Station Casinos of Nevada have proposed a rather large casino complex near Rohnert Park in Sonoma County, California. I would like to emphasize the danger of establishing a federal water right on land already demonstrated in court to be in substantial groundwater overdraft. If this ill-conceived project is allowed to proceed as planned, it will create an inherently unstable legal climate and jeopardize the water rights of every single stakeholder in Sonoma County, including the Sonoma County Water Agency (SCWA).

The casino, which has already stated its intention to sink multiple one thousand foot wells, would almost certainly be drawn into the flurry of legal actions that have descended on this region of Sonoma County over the last four years. When, and or if, the casino is drawn into any legal fray, the U.S. Attorney General will be constrained to appear to defend that federal right. Federal involvement will dramatically increase the chance that the entire County is thrown into water adjudication.

It would be difficult to find a more inappropriate site for a casino (actually, for any large water consumer) than the one near Rohnert Park. The location is practically in the middle of a now-famous groundwater study conducted by PES Environmental, Inc. This study, part of a routine Rohnert Park EIR, proved compelling evidence in a successful lawsuit against Rohnert Park lodged by the South County Resource Preservation Committee, a suit and an organization out of which the O.W.L. Foundation grew.

Please consider the attached documents prepared by our attorneys which describe in more detail the water and the legal difficulties suffered by this particular region of Sonoma County. If you have any questions or would like more information regarding this matter, I can be reached at the telephone number or email address on the letterhead.

Sincerely,

H.R. Downs
President

2004 FEB 25 PM 2:36

P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

O.W.L. Foundation policy statement prepared by Ed Casey and Paeter Garcia, Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, 16th Floor, Los Angeles, CA 90071 tel. (213) 576-1000

I. INTRODUCTION

An extremely large development project (Indian casino and hotel/retail center) is slated for an identified region of Sonoma County where groundwater supplies are already being critically overdrafted. *Clearly, a sufficient and sustainable water supply does not exist for the project*, particularly in light of the region's prevailing water crisis and the current and future water needs of local residents. For that reason alone, the project should not be allowed to proceed. However, the Casino project's sovereign status would make matters even worse. For instance, the project may seek to ignore state environmental protection laws and local water management efforts and, in the event of groundwater litigation, the project could unjustly obtain priority over longstanding water rights held and relied upon by local landowners, cities, water agencies, and the County.

For these and other reasons discussed below, the O.W.L. Foundation (Open Space, Water Resource Protection, Land Use) ("O.W.L.") urges that the Casino project should be denied.

II. BACKGROUND

O.W.L. is a non-profit organization headquartered in the community of Penngrove, Sonoma County, California. O.W.L.'s membership is comprised of residents throughout Sonoma County, including residents of Penngrove, who understand that immediate steps must be taken to avoid a disastrous outcome for one of their County's most precious resources – water – groundwater in particular.

Penngrove is situated in the valley floor west of the Sonoma Mountains, roughly between the City of Rohnert Park, to the North, and the City of Petaluma, to the South. Like many communities of Sonoma County, Penngrove has historically relied on local groundwater, including the Santa Rosa Plain Groundwater Basin, to provide a reliable water supply for its residents and agricultural industry. (See Attachment A.) However, in connection with the last two decades of increased urbanization in Sonoma County, that once reliable groundwater supply has been drastically overproduced and woefully undermanaged. In fact, federal, state, and local water agencies have all found that Sonoma County's groundwater resources are in serious jeopardy. Surface water supplies available to the County are equally strained, and a recent Court of Appeal decision confirmed that Sonoma County's water supply problem extends far beyond any quick-fix.

Notwithstanding this undeniable state of affairs, which could easily result in a complete public fiasco, the Sonoma County Water Agency, the County Board of Supervisors, and various municipalities have turned a blind eye to the County's water crisis and have determined to proceed with a host of new projects – including the Casino project – *without* being able to demonstrate that a sufficient, reliable, and sustainable water supply exists for those projects in light of the County's current and future water needs. (See pp. 12-13, below, regarding the proposed Casino project.)

III. WATER RESOURCE MANAGEMENT IS A PUBLIC RESPONSIBILITY

O.W.L. has stepped in and asked these public agencies to take a hard look at the consequences of their actions. For years, O.W.L. members have attended town hall forums, commission meetings, and city council hearings to voice their concerns about the looming water scarcity and about the impacts that local decision-making has on Countywide water resource management. O.W.L. has consistently presented an abundant variety of undisputable facts about existing and worsening conditions of groundwater basin overdraft and overall County water supply. (The entirety of reports, charts, maps, diagrams, and other relevant water supply information submitted by O.W.L. are not included with this letter, yet copies of that information can be provided upon request.)

A. Existing Groundwater Overdraft Must be Addressed and Resolved

1. Basin Overdraft is a Serious Problem

Groundwater basin overdraft occurs when the rate at which groundwater is produced from a basin exceeds the average annual amount by which the basin is replenished by rainfall and percolation from other natural water sources. Overdraft is often defined as the condition resulting from the continual lowering of the level and gradual reducing of the total amount of stored water, the accumulated effect of which, after a period of years, renders the supply insufficient to meet the needs of the public. Prolonged overdraft can cause numerous long-term detrimental economic and environmental impacts. When a groundwater basin is in overdraft, groundwater users must often deepen their wells and install more powerful pumps to extract a sufficient supply of water from ever-greater depths of the basin. To that end, overdraft can also result in land subsidence, loss of surface vegetation and wetlands habitat, and severe degradation of groundwater quality. Perhaps most notably, however, overdraft causes injury to existing water rights and often leads to complicated and protracted litigation to adjudicate a basin's water supply.

2. Areas of Natural Recharge Must Be Protected

Groundwater overdraft can be corrected by taking steps to replenish a depleted basin and protect areas of natural recharge. For the most part, groundwater basins are recharged by natural percolation, where rainfall and other waters are allowed to collect and percolate down into the basin. This process typically occurs through stream beds or areas of open space with porous soil know as "areas of natural recharge." When areas of natural recharge are developed and covered by buildings, streets, sidewalks, and other non-permeable surfaces, natural basin replenishment cannot occur and groundwater overdraft is exacerbated. Once the recharge areas are gone, they cannot be replaced.

3. O.W.L. has Shown that Severe Overdraft Exists in the County and that Areas of Natural Recharge are Being Lost at an Alarming Rate

O.W.L. members have used publicly available information to show the County, the County Water Agency, and local municipalities that the Santa Rosa Plain Groundwater Basin and other adjoining groundwater basins are seriously overdrafted and further threatened by the continual loss of areas of natural recharge.

With regard to overdraft, O.W.L. has pointed to reports prepared by these agencies' own consultants to show the extent of the County's groundwater crisis. For example, in the southern portion of the Santa Rosa Plain Groundwater Basin encompassing the cities of Rohnert Park, Cotati, and northern Penngrove (Attachment B), annual recharge is approximately 1.6 million gallons per day ("mgd"), yet annual production in that area exceeds 5.0 mgd. This drastic overdraft of the basin has caused local groundwater levels to drop by as much as 150 feet. (See Attachments B and C.)

Indeed, in 2002, the Sonoma County Water Agency pumped 5.4 mgd from three nearby "emergency wells" (enough to supply about 30,000 urban customers) even though the Agency has not declared that any emergency exists. Even worse, the Agency produces this groundwater from rural areas of Sonoma County and sells and exports a substantial portion of that water to fuel urban growth in Marin County. As a result, rural Sonoma County residents near Sebastopol are beginning to voice concerns that numerous recent dry wells in their area are being caused by the Agency's excessive pumping from the "emergency wells."

Information published by the State Department of Water Resources ("DWR") clearly supports the conclusion that the region has fallen into serious overdraft. DWR indicates that the annual rate of groundwater production in the Santa Rosa Plain between 1960 and 1975 was *barely* in balance with the rate of groundwater replenishment for that same period (which is consistent with the City of Rohnert Park's EIR assessment for its General Plan, above; See Attachment C, Figure 4.10-2.) Similarly, as early as 1972, the United Stated Geological Survey ("USGS") characterized the majority of the Sonoma County groundwater basin complex as "marginal" or "inadequate" for municipal uses. However, by 1999, the City of Rohnert Park had increased its groundwater production to an annual average of 4.3 mgd in the Santa Rosa Plain Groundwater Basin, while recharge remained unchanged at an average 1.6 mgd. (See Attachments B and C.) Moreover, in 2002, the Sonoma County Water Agency increased groundwater pumping in the same region from zero to 5.4 mgd.

Equally telling, the U.S. Department of the Interior ("DOI") recently published a map in May 2003 of the Western United States entitled "Potential Water Supply Crises by 2025." The map identifies areas were "existing supplies are not

adequate to meet water demands for people, for farms, and for the environment." The DOI concludes that Sonoma County has a "substantial conflict potential" over water supplies and ranks the County's water resource crisis in the same category as the Klamath Basin, where farmers, tribes, and the federal and state government are locked in a bitter feud over limited water supplies and competing water rights.

With regard to areas of natural recharge, O.W.L. has pointed to maps prepared by DWR and USGS which specifically designate various lands in Sonoma County as being critical to groundwater recharge. The Sonoma County Planning Department uses these same maps to describe such lands as dedicated "areas of natural recharge." (See Attachment D.) The bed of the Russian River is also a key source of groundwater recharge for the County. Notably, DWR recently issued the following statement as number 4 on its list of 10 "Major Recommendations" in its 2003 Bulletin 118 Update:

- Groundwater management agencies should work with land use agencies to inform them of the potential impacts various land use decisions may have on groundwater, and to identify, prioritize, and protect recharge areas.
- Local planners should consider recharge areas when making land use decisions that could reduce recharge or pose a risk to groundwater quality.
- Recharge areas should be identified and protected from land uses that limit recharge rates; such as paving or lining of channels.
- Both local water agencies and local governments should pursue education and outreach to inform the public of the location and importance of recharge areas.

O.W.L. advocates for responsible growth and adheres to the simple proposition that development and transformation of dedicated recharge lands prevents basin replenishment and substantially limits the amount of groundwater supply available for residents' existing and future needs.

B. A Key Community Group Successfully Litigated Against the City of Rohnert Park for the City's Failure to Adequately Assess Groundwater Impacts

A key community group (which evolved into O.W.L.) first stood ground in 2002 when it filed a lawsuit against the City of Rohnert Park for violating the California Environmental Quality Act ("CEQA") through its failure to adequately analyze the impacts that City's General Plan Update would have on groundwater resources. The lawsuit resulted in a stipulated judgment which restricts the City's land use approvals in relation to existing overdraft conditions. For instance, the Judgment requires that any CEQA document prepared by the City for a project located outside of its 1999 boundaries must include (1) a determination of the project's water demand, (2) an analysis of whether the total projected water supplies available to the City during normal, dry, and multi-dry years during a 20-year projection will meet the projected water demand associated with the project, and (3) an identification of the water supply that is proposed to serve the project. The City is also prohibited from approving any project outside its 1999 boundaries whose net consumptive water use impact on the City's water supply will contribute to the City exceeding an average annual groundwater pumping rate of 2.3 mgd (half of the City's mean pumping rate between 1984 and 1999.) Notably, even this amount of groundwater production is at odds with the City's own General Plan concept of "safe yield" which clearly recognizes that the groundwater subbasin is only replenished at the average rate of 1.6 mgd.

Further, the 2002 Judgment required the City to amend its sphere of influence to remove 170 acres of land within the Penngrove Specific Plan that were previously added to the City's sphere. The City had intended to re-zone those lands from one home per 20 acres (which would still permit natural groundwater recharge) to various new zoning designations that would allow high density residential, commercial, and industrial development (which would transform the open permeable soil to impermeable hardscape and prevent groundwater recharge).

C. O.W.L. Convinced Sonoma County Representatives to Include Key Water Management Objectives and Policies in the County's General Plan Update

In 2003, O.W.L. participated in the public review process conducted by a Sonoma County Citizens Advisory Committee ("CAC") to accept comments on and develop a draft "Water Resources Element" for the County's General Plan Update for the

year 2020. While that process is still underway, O.W.L. was instrumental in guiding the CAC to develop key policies and objectives that are protective of existing groundwater resources and recharge lands and aimed toward responsible management of water resources generally on a Countywide basis. Some of the more critical provisions of the Water Resources Element are:

- The general objective of using only sustainable water supplies to satisfy future growth.
- The general objective of protecting existing recharge areas.
- The policy of denying discretionary development applications if cumulative development will cause or exacerbate groundwater overdraft.
- The policy of requiring study of proposed development projects and their potential impact on overdraft, land subsidence, and saltwater intrusion.

IV. A SERIES OF RECENT DEVELOPMENTS HIGHLIGHT SONOMA COUNTY'S CONTINUING WATER CRISIS

Numerous recent developments illustrate that the water resource crisis in Sonoma County has finally come to a head.

A. The Eel River Decision

In a May 2003 decision, the First District Court of Appeal held that the Sonoma County Water Agency did not comply with CEQA and overturned an EIR that the Agency prepared for its Water Supply and Transmission System Project to divert additional water from the Russian River for distribution to Sonoma County cities and other water purveyors. The Court determined that the Agency failed to account for a possible loss of Russian River water that may occur if PG&E's pending application to divert less water from the Eel River for its hydroelectric power plant is granted by a federal agency. Since such water diverted from the Eel River, in turn, feeds into the Russian River, less water will be available in the Russian for the Agency to take and distribute if PG&E takes less water from the Eel River.

The Court of Appeal stated that "[Sonoma County Water Agency's] failure to consider the impact of the potential curtailment of water from the Eel River has resulted in an EIR that fails to alert decisionmakers and the public to the possibility that the Agency will not be able to supply water to its customers in an environmentally sound

way." As a result of the Eel River decision, the Agency's plans to divert additional surface water from the Russian River are indefinitely on hold.

B. The Sonoma County Water Agency Admits that it Does Not Have an Adequate 20-Year Supply

In response to the Eel River decision, the General Manager for the Sonoma County Water Agency issued a letter in August 2003 stating that water suppliers (including local municipalities) that have contracts to receive water from the Agency should not rely on the delivery estimates contained in the Agency's 2000 Urban Water Management Plan, which indicated that water supplies available to the Agency would be adequate over the next 20 years. Unfortunately, many of the local municipalities had already approved development projects and land use plans in reliance on the information contained in the 2000 Urban Water Management Plan. In light of requirements under California's new water supply laws (SB 221 and SB 610; *See discussion below*), the Agency also issued the following admonishment:

> "[M]anagers of all public water systems relying on water diverted under the Agency's water rights must work together with local planning agencies to determine the extent to which additional supplies are available to each system for proposed new developments, given existing demand, existing approved development, the water remaining under the Agency's 75,000 afy limit and other supplies that each public water supplier may have available." [The Agency's delivery estimates before the Eel River decision were set in excess of 100,000 afy.]

The Agency also recommended that each water purveyor take certain steps to provide a meaningful assessment and monitoring of water demand, including: (1) immediately evaluate the expected future water demands for existing and approved development projects and provide the Agency and other Agency contractors with that information; (2) identify the source of water for those projects; and (3) evaluate the future water demands anticipated from proposed, but not yet approved, development projects.

Clearly, this admission by the largest surface water supplier in Sonoma County that it does not have a sufficient 20-year supply means that municipalities and water purveyors will look to increased groundwater production to serve the growth that

may have already been sanctioned under local general plan processes. However, as set forth above, that groundwater supply is already overdrafted.

C. The County of Sonoma Permit and Resource Management Department has Acknowledged Existing Groundwater Overdraft

In November 2002, the County's Permit and Resources Management Department ("PRMD") determined that unmitigated groundwater impacts would be caused by a particular development project proposed by the City of Rohnert Park. PRMD disapproved of the proposed project on three separate grounds, including:

- The water balance shows that this portion of the Santa Rosa Basin is in overdraft (recharge is estimated at 1900 afy, the City of Rohnert Park is removing 5,040 afy, and this project may remove as much as 193 afy).
- The estimated overdraft situation is confirmed by the City of Rohnert Park's General Plan 2000 which acknowledges a lowering of the water table in this area by 100 to 150 feet. (See Attachments B and C.)
- The Revised Rohnert Park General Plan speculation that the City will reduce its groundwater removal by up to 50% is unsupported by purchase contracts for more imported surface water.

These comments clearly illustrate the disharmonious relationship between the Eel River decision, the admission by Sonoma County Water Agency that available surface water supplies will be less than anticipated, and the looming trend by local municipalities to further rely on an already overdrafted groundwater supply.

D. The Kleinfelder Report

In September 2003, the "Kleinfelder Report" was issued. The Report was commissioned by the County Board of Supervisors and confirmed the long-foregone conclusion that particular study areas of the County's groundwater basin complex are experiencing serious water scarcity. The Kleinfelder Report concludes, in part, that "[a]dditional groundwater extraction is likely to increase the rate of overdraft and result in further decline of the groundwater levels. ... Levels will continue to drop as long as extraction exceeds recharge."

PRMD reported to the County Board of Supervisors that the findings in the Kleinfelder Report will need to be considered in connection with any new

discretionary applications in the study areas (e.g., subdivisions or use permits) because "at a minimum, the Report will constitute 'substantial evidence' under CEQA that a cumulative groundwater impact may exist ..."

V. VARIOUS WATER MANAGEMENT TOOLS ARE AVAILABLE TO ALLEVIATE THE COUNTY'S WATER CRISIS

While California does not have a statewide regulatory system for surface and groundwater management, various methods are available to protect and preserve those resources, including new water supply legislation, groundwater ordinances, and water management plans. If used properly, these tools can address and alleviate the water crisis in Sonoma County.

A. SB 221 and SB 610 Promote "Responsible Growth"

Effective since January 2002, California's water supply laws (commonly referred to as SB 221 and SB 610) impose strict requirements on certain development projects. Generally, projects subject to SB 221 and SB 610 are those containing 500 or more residential dwelling units, commercial or industrial projects that fall within certain size parameters, and projects that would have a water demand equivalent to a residential development project with 500 units or more.

In general, for any project subject to SB 221 and/or SB 610, the project cannot be approved unless the project proponent can provide verification from the local water purveyor that a sufficient water supply is available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand created by the project in addition to existing and planned future uses, including agricultural and industrial uses. Particularly relevant to Sonoma County, if the water supply for the proposed project includes groundwater, the purveyor must consider and analyze multiple factors concerning the condition of the supplying groundwater basin and its rights to extract such groundwater among other competing users.

B. Local Groundwater Ordinances Offer Solutions for Overdraft

Cities and counties in California have the authority to adopt groundwater ordinances pursuant to their police powers to protect the public, health, safety and welfare in areas that are not already regulated by the state. As California does not have a

uniform groundwater regulatory scheme, nearly half of its counties, and many cities, have adopted local groundwater ordinances.

The general intent of groundwater ordinances is to protect and preserve the viability of the existing groundwater supply. To that end, many groundwater ordinances focus on restricting projects insofar as they may adversely affect groundwater supplies, propose to export groundwater outside of the basin or county boundaries, degrade groundwater quality, or cause land subsidence. However, other groundwater ordinances have a broader scope, and are also geared toward managing groundwater resources for existing needs and planned growth.

Ordinances are typically implemented in connection with groundwater extraction permits, and center on whether the basin is operating within its "safe yield." Generally, safe yield is the amount of water that can be produced from a groundwater basin under a certain set of circumstances, over a given amount of time, without causing basin overdraft and without causing other adverse impacts.

O.W.L. has proposed the idea of using groundwater ordinances to the County Board of Supervisors, the County Water Agency, and various municipalities as a potential means of addressing and alleviating the impending water crisis in Sonoma County. To date, however, those agencies have not taken steps to craft or implement a new groundwater ordinance.

C. Groundwater Management Plans Can Harmonize Countywide Efforts to Preserve and Protect Water Resources

In 1992, the State Legislature adopted the "Groundwater Management Act" which is commonly referred to as AB 3030. (The Act is set forth by California Water Code Sections 10750 to 10755.4.) AB 3030 begins with the following proclamation by the Legislature concerning the protected status of groundwater:

> "The Legislature finds and declares that groundwater is a valuable natural resource in California, and should be managed to ensure both its safe production and its quality. It is the intent of the Legislature to encourage local agencies to work cooperatively to manage groundwater resources within their jurisdictions."

A groundwater management plan under AB 3030 may be adopted by any local agency, including municipalities, that provides water service, flood control, groundwater management, or groundwater replenishment. Pursuant to AB 3030, groundwater management plans address a wide range of management issues, including, but not limited to: (a) controlling saline water intrusion; (b) identifying and managing wellhead protection areas and groundwater recharge areas; (c) regulating migration of contaminated groundwater; (d) administering well abandonment and well destruction programs; (e) mitigating the effects of groundwater overdraft; (f) replenishing groundwater extracted by producers; (g) monitoring groundwater levels and water storage; (h) facilitating conjunctive use operations; (i) identifying well construction policies; (j) constructing and operating groundwater contamination cleanup, recharge, storage, conservation, recycling, and extraction projects; (k) developing relationships with state and federal regulatory agencies; and (l) reviewing land use plans and coordinating with land use planning agencies to assess activities that create a reasonable risk to groundwater resources and management.

O.W.L. has strongly advocated for the Somona County Water Agency to develop and implement a groundwater management plan. Recently, as part of its process to restructure the entitlement contracts to Lake Sonoma water in response to the Eel River decision, the Agency has more openly acknowledged the need to prepare such a plan. However, successful water management requires cooperation and "buy in" from surrounding agencies concerning efforts to moderate water production and conserve resources. That type of approach could easily be scuttled by the proposed Casino project.

VI. THE PROPOSED CASINO NEAR THE CITY OF ROHNERT PARK CONTRAVENES ALL ABOVE-MENTIONED PRINCIPLES OF WATER RESOURCE MANAGEMENT

Now that O.W.L. and other concerned members of the public are beginning to make progress with County and local decision-makers regarding water resource management, a new proposal is being made to locate a Las Vegas-style Indian gaming casino and hotel/retail complex just outside the city limits of Rohnert Park. Aside from the environmental impacts that this project would cause to various other County resources (i.e., wetlands, endangered species, growth inducing impacts), the

proposed Casino would drive a galvanized nail into the coffin of Sonoma County's water supplies.

Under federal case law (the "Winters Doctrine"), when an Indian reservation is established, "federally reserved water rights" attach to the reservation land for purposes of supporting the purposes and livelihood of the Indian Nation for which the reservation was created. The Winters Doctrine illustrates that federally reserved water rights enjoy powerful priority over pre-existing, state-based rights, and are protected against loss, interference, or injury. Indian water rights are protected pursuant to the trust relationship that exists between the federal government and Indian Nations. The federal government has an affirmative duty to protect the viability of these water rights and is subject to liability for failure to do so. Examples exist statewide of multi-million dollar settlements in favor of claims by Indian Nations that injury has been caused to their federally reserved water rights.

In light of the foregoing, serious implications could arise from the establishment of federally reserved water rights in the Sonoma County groundwater basin system. Given the groundwater overdraft and surface water problems that already prevail in the southern portion of the Santa Rosa Plain Groundwater Basin (*see discussion above*; Attachments B and C), those federally reserved rights would further jeopardize the ability of existing landowners and water purveyors to exercise their water rights. For instance, the well-documented overdraft in the Rohnert Park area already contributes to degradation to local water quality and has required surrounding water users to drill deeper wells. Water extracted for the Casino project would only magnify those problems. Moreover, overdraft conditions may result in a groundwater adjudication, where rights to produce groundwater now and in the future would be divided among landowners, cities, and other water agencies according to legal priority. Given the heightened priority that is afforded to federally reserved water rights, local landowners and agencies that have relied upon County groundwater for generations could be subject to enormous and irreparable harm.

In addition to those concerns, an Indian Nation would not likely be required to comply with CEQA, SB 221 and SB 610, a locally enacted groundwater ordinance, or a groundwater management plan due to its status as a sovereign nation.

Thus, despite whatever solutions may be crafted to address the County's water resource crisis, the Casino could be permitted to turn a blind eye and continue groundwater production, depletion, and mismanagement of the local groundwater basin.

As the Casino proposal is first dependent on the project site being designated as federal reservation land, O.W.L. has advocated for strict environmental review under the National Environmental Policy Act ("NEPA"), which applies to federal discretionary decisions that may "significantly affect the human environment." O.W.L. has argued that, at a minimum, the factors of (1) a critically overdrafted groundwater basin, (2) the Countywide surface water limitations under the Eel River decision, (3) the current Williamson Act designation of the proposed Casino site, and (4) the existence of multiple endangered species issues at the proposed site give rise to the need for thorough federal NEPA review before the proposed site is designated as a federal reservation.

VII. CONCLUSION

Many other groups and local citizens are objecting to the proposed Casino project on various legal, social, and environmental grounds. While supporting and concurring with many of those objections, O.W.L. is focused on the key point that any invitation to create a federally reserved water right in the local, overdrafted basin is an ill-conceived idea that would exacerbate the existing water crisis and contravene the water-related interests of the County, its cities, and all Sonoma County residents.

ATTACHMENT "A"

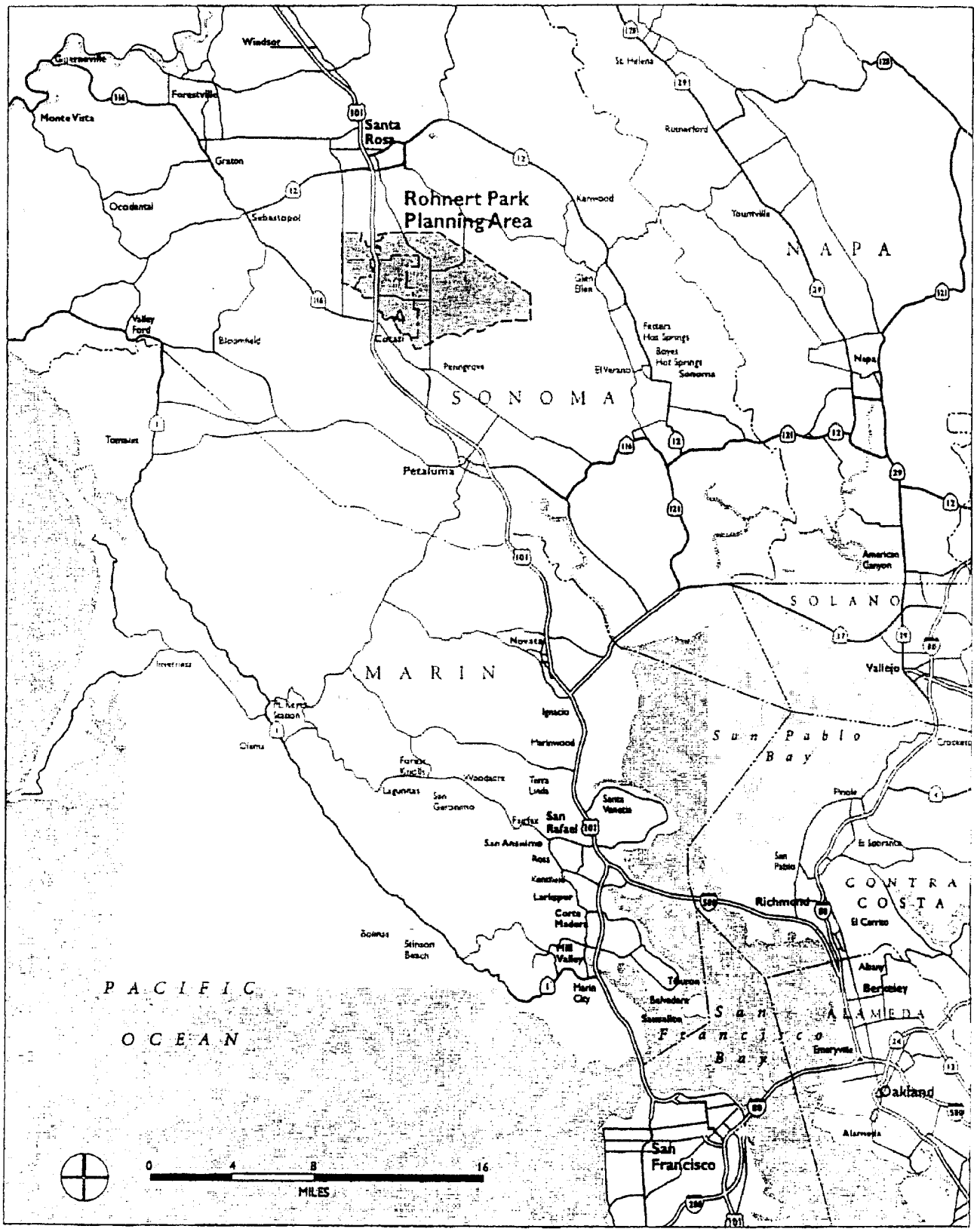
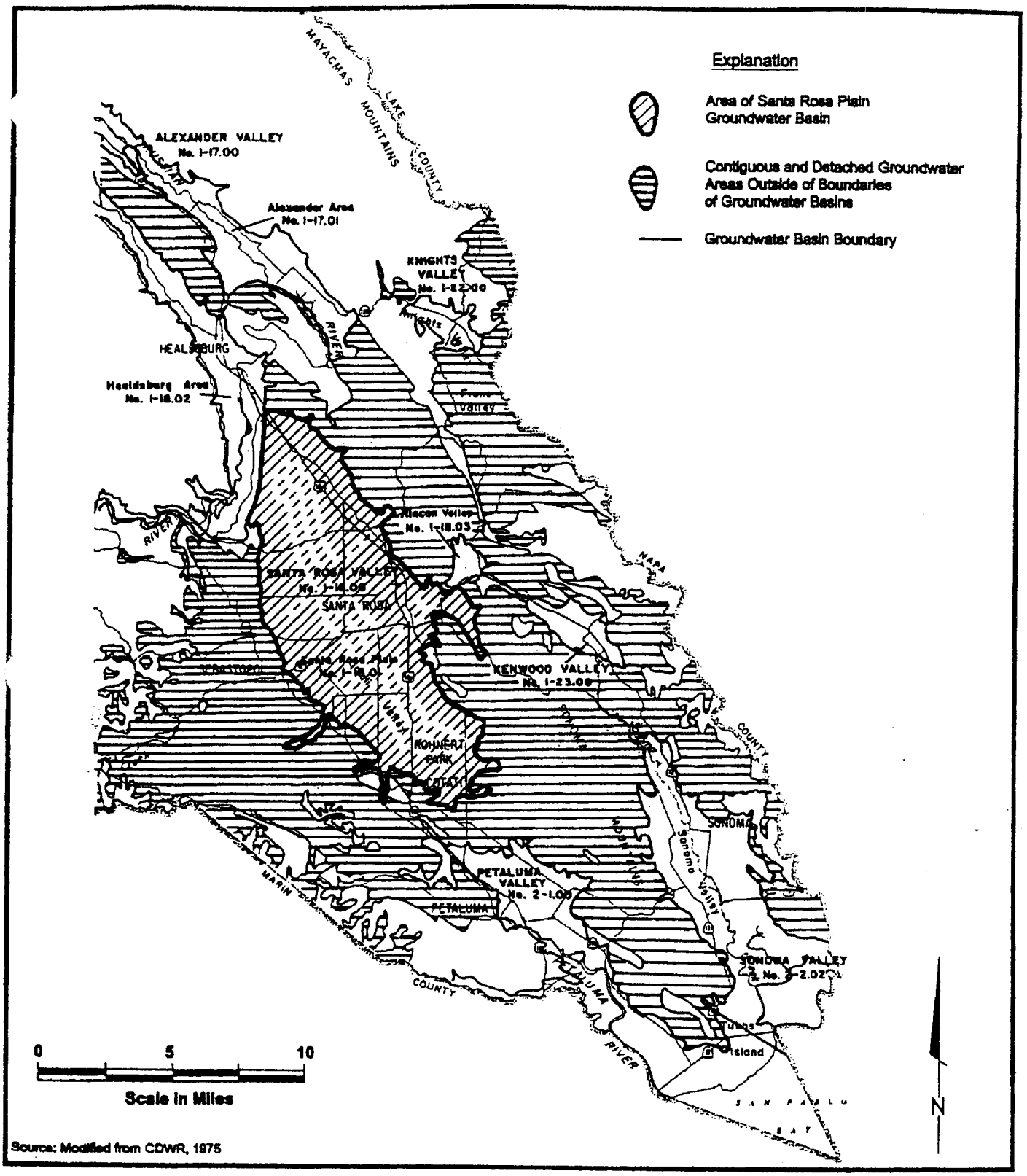


Figure 3.1-1

Regional Location



Source: Modified from CDWR, 1975

PES Environmental, Inc.
Engineering & Environmental Services

Figure 4.10-1
Location Map
Santa Rosa Plain
Groundwater Basin

ATTACHMENT "B"

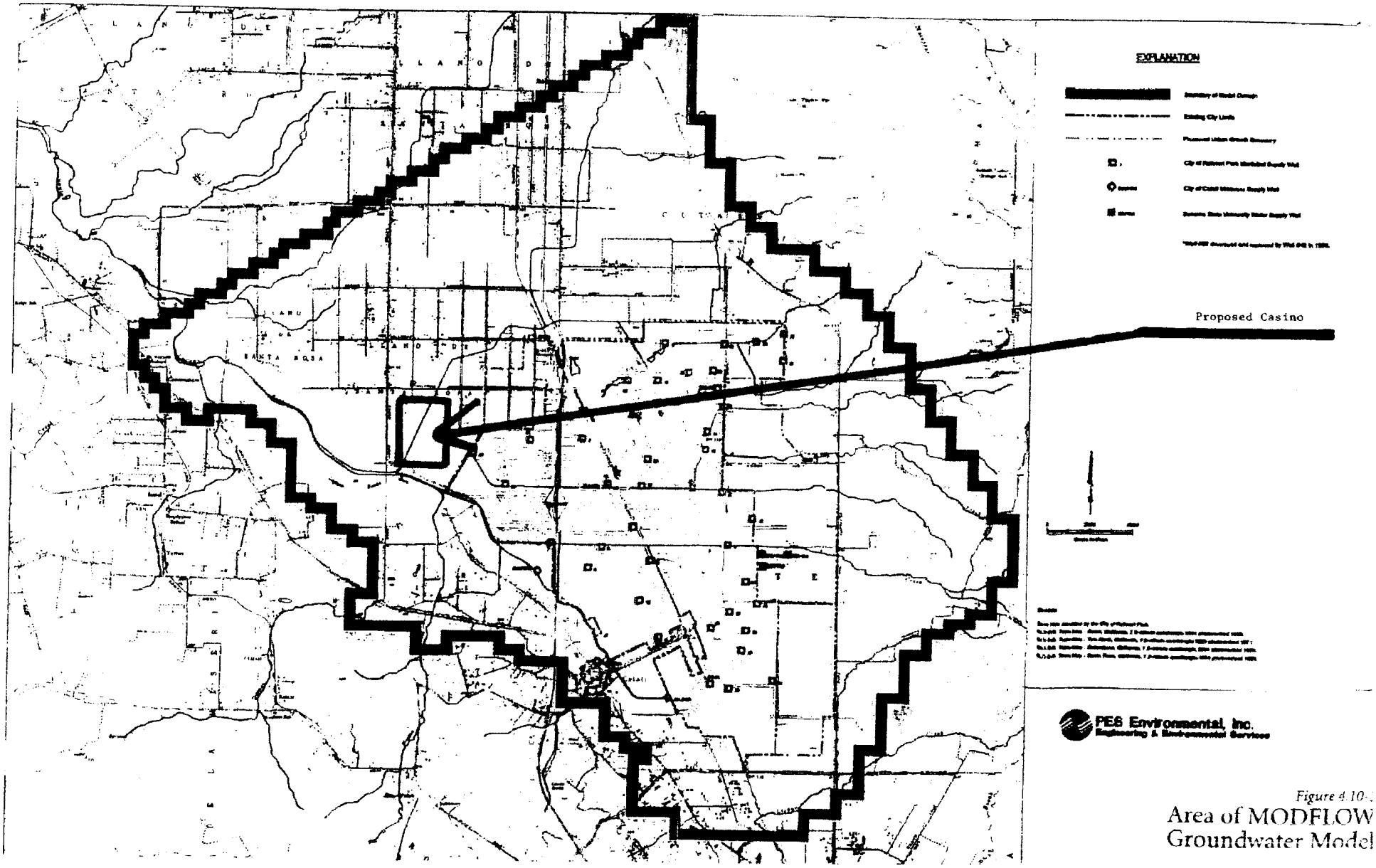
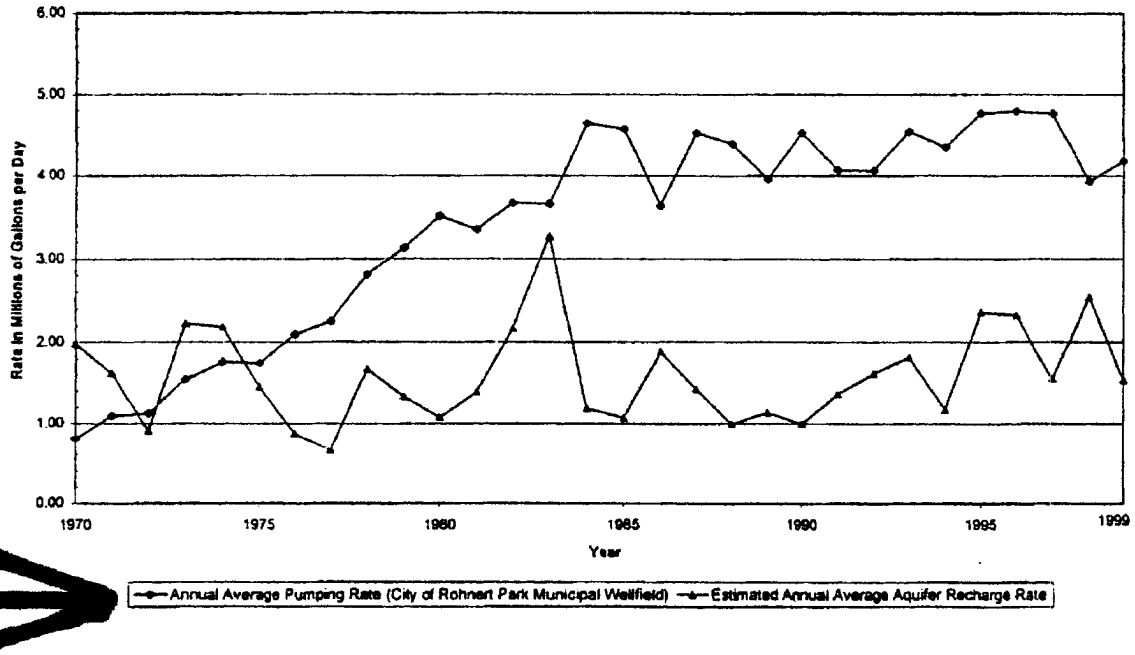


Figure 4.10-
Area of MODFLOW
Groundwater Model

ATTACHMENT "C"

Since at least 1966, it was less expensive for the City to pump groundwater as a source to supplement water-supply requirements, than to purchase water from the SCWA. However, over time, purchasing water from the SCWA became less expensive due to increased energy costs and capital and operation costs associated with maintaining a wellfield. Also, groundwater pumping has been affected by increasing well maintenance requirements. Hence, since the mid-1990s, the City has used additional SCWA water and relied less on their municipal wellfield; the excess well capacity serves as a back-up system in case of emergency situations or drought conditions. The annual average production rates for the City's municipal wellfield from 1970 through 1999 are shown graphically on Figure 4.10-2. The production rates range from an annual average of approximately 0.8 mgd in 1970 to 4.8 mgd in 1994.

Figure 4.10-2. Annual Average Rates of Recharge and Pumping
MODFLOW Groundwater Simulations
1970 through 1999



Sonoma County Water Agency

SCWA provides potable water to more than 500,000 people in Sonoma and Marin counties. Rohnert Park receives SCWA water from the Petaluma Aqueduct. The source of the aqueduct water is the Dry Creek watershed. Dry Creek water is captured behind Warm Springs Dam in Lake Sonoma. This water is released, and conveyed down Dry Creek to the Russian River, where it is then diverted into the SCWA basins.

- Compare estimated annual average recharge rates with requirements of the City's municipal wellfield in accordance with the schedule for the General Plan presented in Table 4.10-3.

Analysis of Impacts

Impact 4.10-a: **Production of groundwater resources may result in the lowering of groundwater levels in the vicinity of the proposed Urban Growth Boundary.** (Significant)

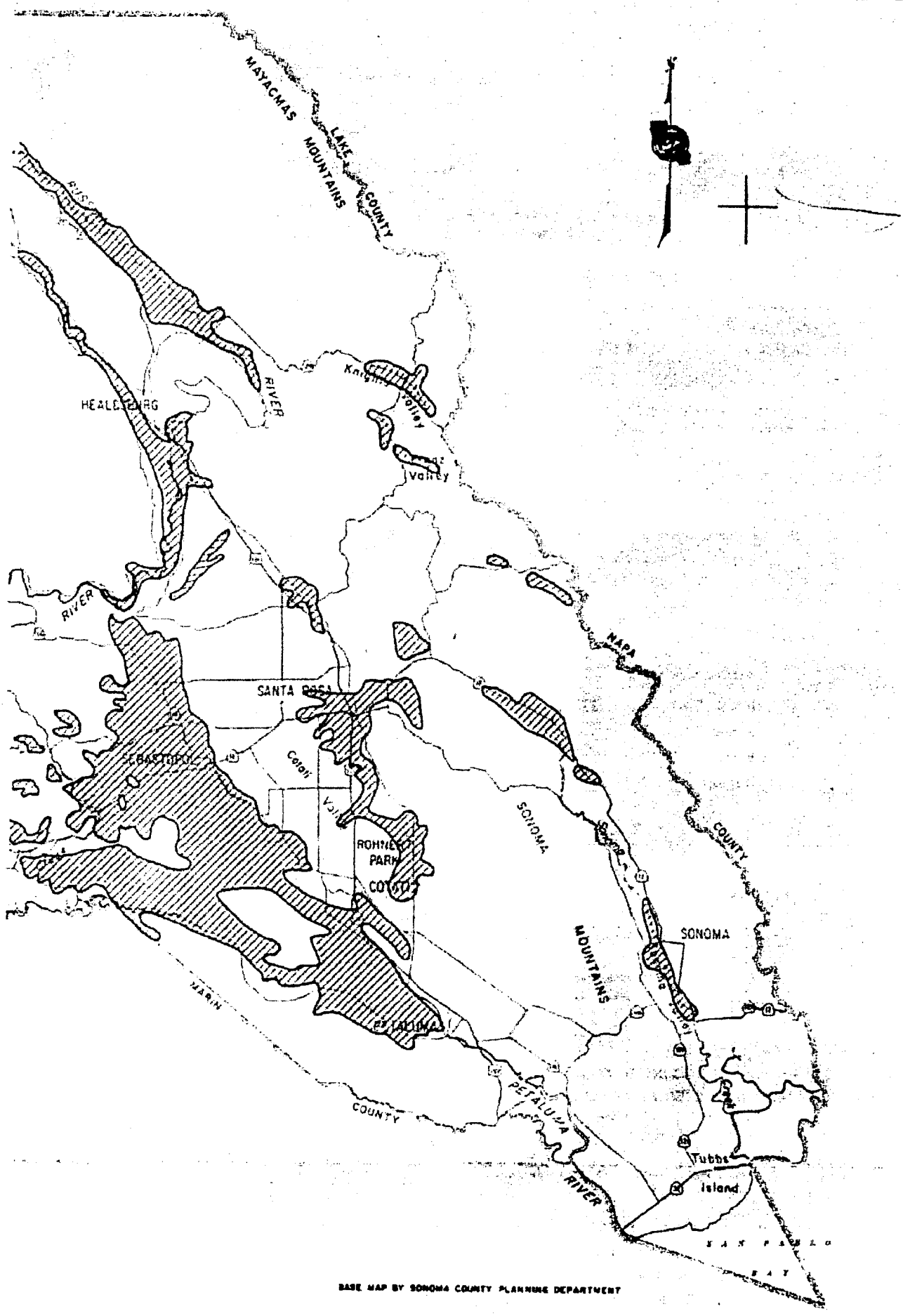
Results of modeling simulations performed for 1952 and 1970 through 1999 indicate estimated annual average recharge rates within the model domain ranged from 0.66 mgd during the drought in 1977, to 3.28 mgd during a year of above average annual precipitation in 1983. Comparison of the range of estimated annual average recharge rates (0.66 to 3.28 mgd) with the City's municipal wellfield requirements during implementation of the General Plan (1.9 to 2.3 mgd as indicated in Table 4.10-3), indicates the potential for short-term impacts to occur during years of implementation from 2000 through 2009 if annual average recharge is less than 1.9 to 2.3 mgd. Annual average recharge would be less than 1.9 to 2.3 mgd if annual precipitation is less than 36 to 44 inches. The magnitude of the impact, if any, depends on the amount of precipitation in years 2000 through 2009. Any potential impact would cease commencing in the year 2010 when Rohnert Park's entitlement to water provided by the SCWA is planned to increase to the average rate of 15 mgd.

Comparison of the City's municipal wellfield requirements in accordance with Table 4.10-3 and the estimated average annual recharge rate (1.60 mgd) based on modeling simulations performed for 1952 and 1970 through 1999 indicates production requirements would exceed the average annual recharge rate by a range of 0.30 mgd in 2004, to 0.70 mgd in 2009. In comparison, historical production from the City's municipal wellfield has exceeded the estimated average annual recharge rate (1.60 mgd) by a range of 0.15 mgd in 1975, to 3.20 mgd in 1996. Historical production rates from the City's municipal wellfield over the past decade (1989 through 1999), have exceeded the estimated average annual recharge rate by a range of 2.36 mgd in 1989, to 3.20 mgd in 1996. Hence, although the impact of "groundwater overdraft" from the model domain area is potentially significant during the General Plan, the magnitude of the impact is substantially less in comparison to the past decade.

Further analysis of groundwater conditions within the proposed Urban Growth Boundary were performed based on comparison of historical groundwater elevations obtained from 1970 through 1999. In general, observed groundwater levels from 1970 to 1999 indicate the decline of groundwater levels ranges from approximately 35 feet in the northwest perimeter of the proposed Urban Growth Boundary, to approximately 100 to 150 feet along the eastern boundary. Under a reasonable worst case scenario of the City's municipal wellfield requirements in accordance with Table 4.10-3 and the estimated average annual recharge rate (1.60 mgd), the recovery of groundwater levels within the proposed Urban Growth Boundary is expected to begin during the year 2000 due to an increased interim SCWA allocation (as described above and listed in Table 4.10-3). With the increased allocation, wellfield production demand will decrease in comparison to the past decade. On the basis of demand

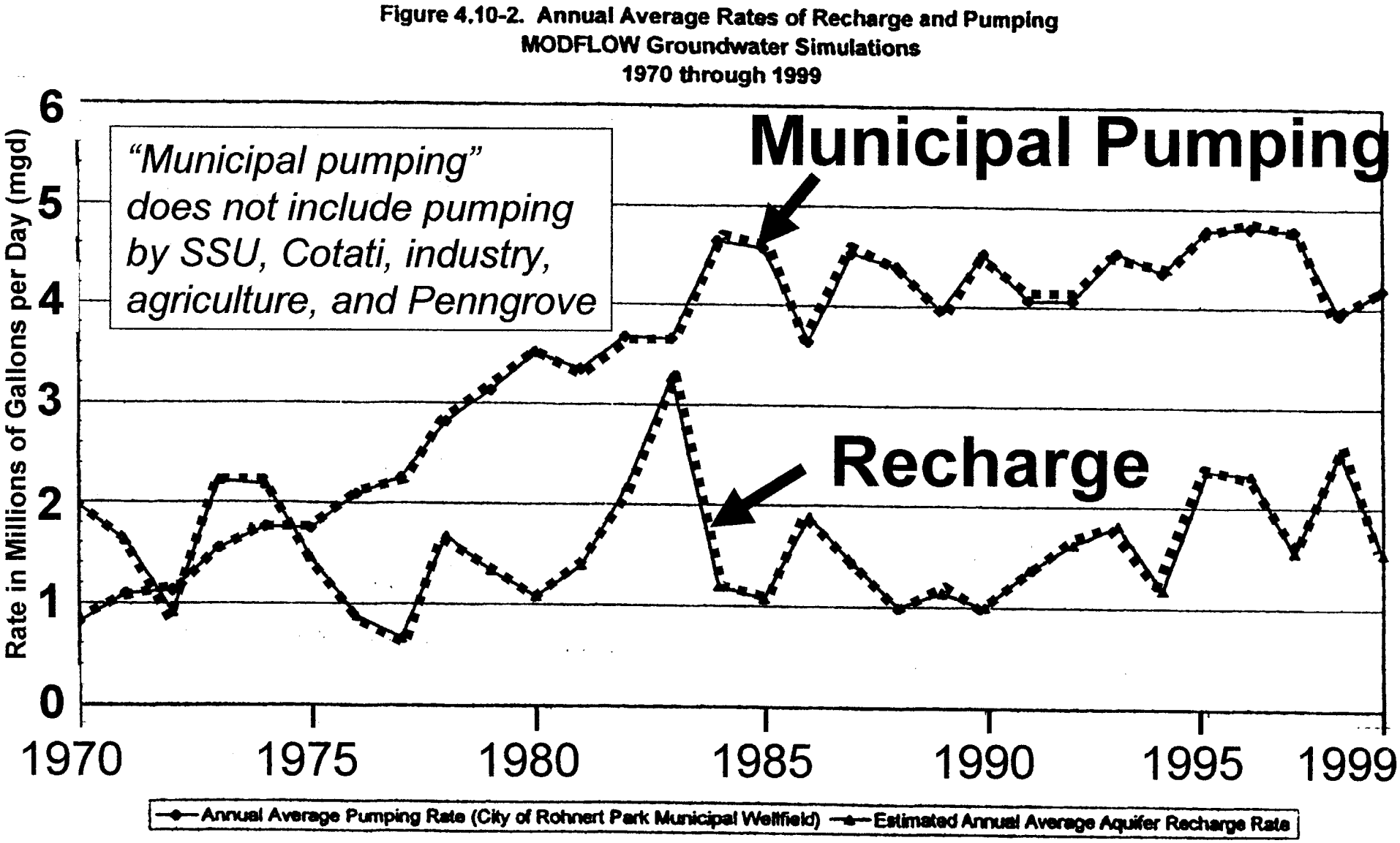
ATTACHMENT "D"

FIGURE 15

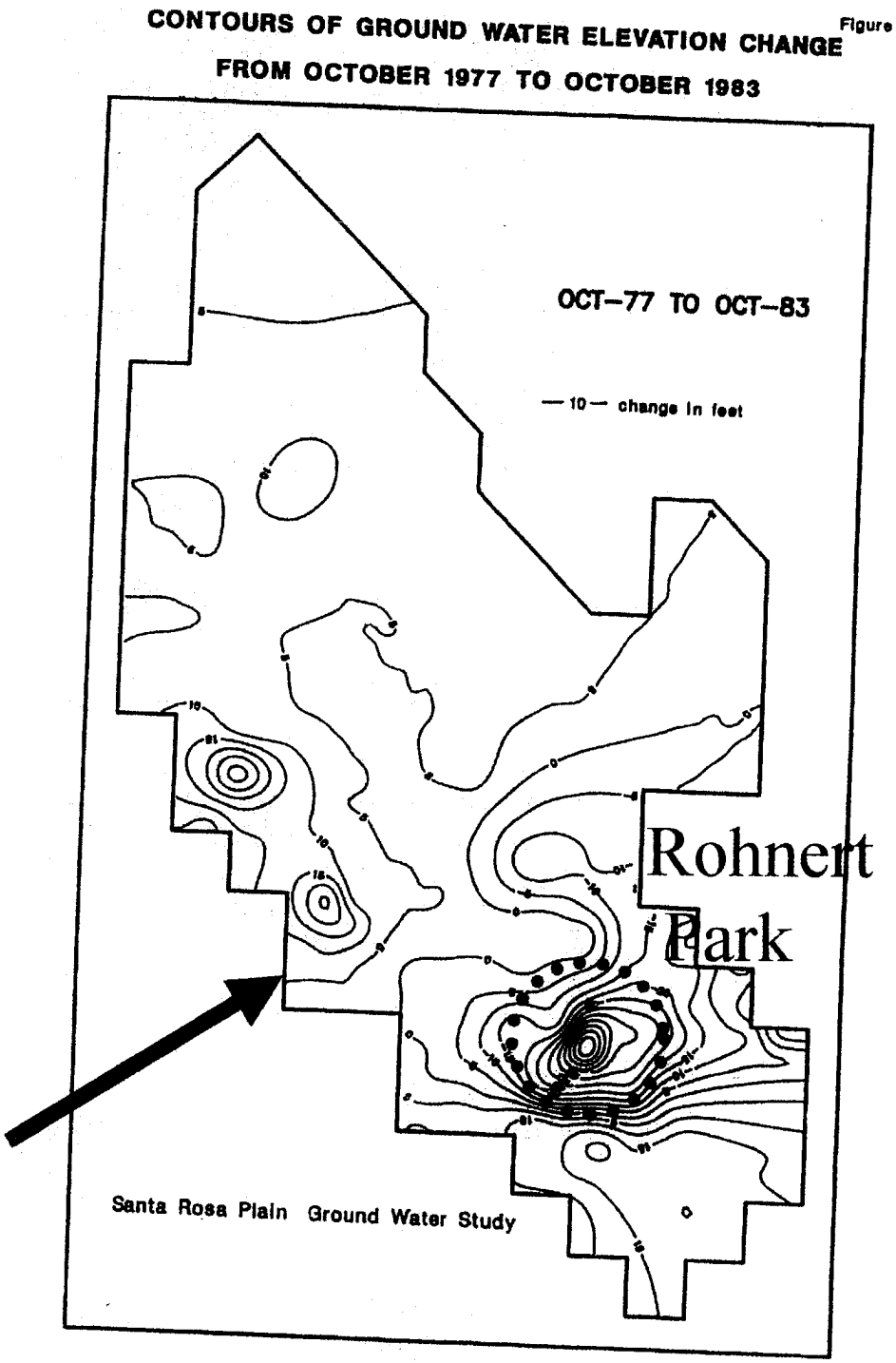


BASE MAP BY SONOMA COUNTY PLANNING DEPARTMENT

Rohnert Park's own EIR groundwater study indicates municipal pumping is 2 _ times greater than recharge.



Back in the 1980s, the California Department of Water Resources (DWR) identified a huge cone of depression centered in Rohnert Park.



Santa Rosa Plain Ground Water Study (1987)

ES

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652

RECEIVED
04 FEB 10 PM 1:33
OFFICE OF THE
EXECUTIVE SECRETARIAT

TO: Honorable Gale Norton, Secretary of the Interior
Fax: (202) 208-6956 email: gale_Norton@ios.doi.gov

701876

TO: Senator Daniel Inouye
Fax: (202) 228-2589 Phone: (202) 224-3934 email: senator@inouye.senate.gov

TO: Senator Ben Nighthorse Campbell
Fax: (202) 228-4609 Phone: (202) 224-5852 email: www.campbell.senate.gov

TO: Governor Arnold Schwarzenegger
Fax: (916) 445-4633 Phone: (916) 445-2841 email: governor@governor.ca.gov

FEB 27 2004

From: Linda Poynter ***Date:*** 2/9/04

950 Golf Course Dr. Rohnert Park, CA 94928

Street Address City

I am sending this to your attention because I strongly feel opposed to the development of a casino in my town, Rohnert Park, California. If this development becomes a reality, there will be a variety of severe negative impacts for our area. For example:

- It will forever change the character of Rohnert Park from a peaceful, family suburb to a large Las Vegas casino mecca. In my opinion, this violates the intent of the BIA policies.
- This is an ***environmentally sensitive area, which*** is adjacent to an open space preserve and home to a number of endangered species, including the tiger salamander.
- It is in a ***community separator***
- It is in a ***floodplain***, whose waters flow into the Laguna de Santa Rosa.
- It is zoned in the Sonoma County General plan ***agricultural land***.
- It is served by ***rural, two-lane roads*** that are inappropriate for heavy casino traffic of up to ***20,000 cars per day***!
- It will further impact Highway 101 that already functions at maximum capacity.
- No water or sewer allocations are available from either Rohnert Park or other agencies.

Please Stop the Casino & help us protect family values in Rohnert Park.

Thank you listening to my concerns. ***Signed:*** Linda K. Poynter

RECEIVED
FEB 18 2004
BUREAU OF INDIAN AFFAIRS
OFFICE OF TRUST RESOURCES MANAGEMENT

WRITTEN COMMENT CARD

653

NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

FEDERATED INDIANS OF GRATON RANCHERIA – HOTEL & CASINO PROJECT

Luther Burbank Center for the Arts, Ruth Finley Person Theater
March 10, 2004

IF YOU WOULD LIKE TO SUBMIT A WRITTEN STATEMENT, PLEASE COMPLETE THE FOLLOWING INFORMATION AND COMMENT IN THE SPACE PROVIDED BELOW. GIVE TO ATTENDENT OR DROP IN THE WRITTEN COMMENT BOX. COMMENTS MAY ALSO BE SUBMITTED BY MAIL TO THE ADDRESS LISTED BELOW.

(Please write legibly)

Name: William P Adams Organization: Individual

Address: 7716 Brett Ave, Rohnert Park, CA 94928-4012

Comment: Rancheria offers to mitigate traffic, water pollution, sewage by installing onsite catchment and sewer treatment. It offers to provide area to develop vernal pools. Presently farming prevents that.

Narrow roads will be widened. Flooding will be controlled where it has occurred yearly.

The maps you used in the scoping meeting are inaccurate in several details.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

654

NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

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(Please write legibly)

Name: LARRY ESPARZA Organization: CITIZENS AGAINST THE CASINO

Address: 44 VERDE CIR Rohnert Park, CA – Rancho Verde MHP

Comment: NOT IN MY BACKYARD – PLEASE

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

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(Please write legibly)

Name: LINDA WORTHINGTON Organization: STOP THE CASINO 101.COM

Address: 8027 MACKEY CT ROHNERT PARK CA 94928

Comment: NO WATER, ENDANGERED SPECIES, HEAVY TRAFFIC CONGESTION FLOOD PLAIN, COMMUNITY SEPARATOR, DISRUPTS FAMILY LIVES, LOSS OF REVENUES FOR LOCAL BUSINESS CONFLICT W/ GENERAL PLAN, IGNORED AGRICULTURE, CRIMINAL ELEMENT, TOXIC CONTAMINATION, WILLIAMSON ACT, ETC. ETC.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

656

NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

FEDERATED INDIANS OF GRATON RANCHERIA – HOTEL & CASINO PROJECT

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March 10, 2004

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(Please write legibly)

Name: Stephen Smith Organization: Citizen of Rohnert Park

Address: 4574 Heron Ct. Rohnert Park, Ca 94928

Comment: I believe that the citizens of Rohnert Park are united in their opposition to the casino. The range of concerns are such that justification for the casino seems impossible. I hope that close scrutiny of the environmental, social, and economic negative impacts is under taken.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

FEDERATED INDIANS OF GRATON RANCHERIA – HOTEL & CASINO PROJECT

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(Please write legibly)

Name: Kathleen Allen Organization:

Address: 4574 Heron Ct, Rohnert Park, CA

Comment: I've lived in Rohnert Park for 24 years & have always appreciated the family community & the commitment of the city to bring family oriented developments to our town (parks in each section, pools, the Performing Arts Center & Community Center to name a few). The water, traffic, & environmental issues are just too much to push off on our town (any one of these would be reason enough). I don't want to see a family town with a huge casino on the fringe. A more suitable location needs to be found.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

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(Please write legibly)

Name: Jasmine Belenger Organization: none

Address: 972 Scenic Ave SR

Comment: I live near site, concerned About the water issue, Traffic increases potential causes of Effects of toxity on enviorment - As a Woman who's son was killed on a narrow S.W road nearby - by a drunk driver I know first hand about intoxicated drivers on small roads - Please urge them to find A more suitable location - We don't want it here it is A danger to community

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WRITTEN COMMENT CARD

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NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

FEDERATED INDIANS OF GRATON RANCHERIA – HOTEL & CASINO PROJECT

Luther Burbank Center for the Arts, Ruth Finley Person Theater
March 10, 2004

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(Please write legibly)

Name: MARIE A ESPARZA Organization: Rohnert Park Citizen

Address: 41 VERDE CIRCLE Rohnert Park CA

Comment: I Reside at RANCHO VERDE Mobile Home PARK. I've Lived Here for 20 yrs. If they put this proposed CASINO in my BACK-YARD – I will sell my HOME & Leave Sonoma County. Please I ASK AND pray that you find Another suitable area to put this CASINO. SKAGGS ISLAND – would Be most appropriate. please please consider my petition! thank you!

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(Please write legibly)

Name: PAUL BURKS Organization: SIERRA CLUB Sonoma Group

Address: 684 Benicia Drive #53 Santa Rosa CA 95409

Comment: I oppose the Casino + Hotel as environmental + community impact grounds.
I also oppose the US Govt selling unceded land to Native American Indians by the invasion of Europeans in the 16th - 17th Centuries through privilege to build Federal Casinos. A true resolution of this 500 yr old injustice is

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Urgently needed. The source should be federal income tax usage to make the Native Americans whole with good land, income generating resources that are good for the earth, the community, and the Native Americans.

I do not support casinos for gambling under any circumstance on moral grounds. I am a United Methodist minister.

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(Please write legibly)

Name: Gloria Hafner-Allee Organization:

Address: 752 Lindsay Ave Rohnert park Ca 94928

Comment: I live, work, go to church, shop in Rohnert Park I am a home owner. Rohnert park has put water meters in. I walk my dog through the neighborhoods and see more and more people putting in landscaping that suits our area. Not exotic shrubs and trees that require a lot of watering. We are trying to save money, to help the environment. The Casino would upset our eco system. I think there are many other better places to put a casino.
Thank you

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(Please write legibly)

Name: Chris Worthington Organization: Independent homeowner

Address: 7400 Mitchell Dr Cotati Park, CA 94931

Comment: See attached document

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(Please write legibly)

Name: Stephen K. Jones Organization:

Address: PO Box 87 Cotati, CA 94931

Comment: GAMBLING IS A SICKNESS. A CASINO IN ROHNERT PARK, MY HOMETOWN, IS TOTALLY NON-PRODUCTIVE, AND WILL BRING IN THE LOWER SOCIO-ECONOMIC ELEMENTS OF SOCIETY. GAMBLING IN ROHNERT PARK WILL BE PART OF THE CONTINUING DEGRADATION OF ALL THE PEOPLE INVOLVED.

Stephen Jones 3-10-04

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(Please write legibly)

Name: A. Colombo Organization:

Address: Box 112 Bodega Bay, CA 94923

Comment:

Have we not treated them badly enough!! Rub the out, that's the answer at least that's what your ancestors that. But we're still here

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(Please write legibly)

Name: Patricia Jones Vasquez Organization: Concerned citizen

Address: 8510 Dorfman Dr Cotati, Ca 94931

Comment: I'm all for everyone to follow their dream but this land belong to the Indians -- remember the letter man took it away from them Nought time we help the Indians, it's called business money for all Indians I'm not my brothers keeper I'm just just here

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(Please write legibly)

Name: Carrie Crandall Organization: (neighbor)

Address: 4301 Primrose Ave. Santa Rosa 95407

Comment: I am very concerned about this project for many reasons, including crime, traffic, water table and especially, flooding.

Flooding – the whole area has poor drainage. Most local roads flood after every big storm. All of our ditches flow south into this property. I fear the problem will be much worse after all the fill-in this project would

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require. The roads have NO shoulder, a mistake on a →

This property is a wetland. There is still lots of standing water there today.

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flooded road could easily cause a drowning if a small car like mine slipped in during a flood.

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(Please write legibly)

Name: Addie A. Dougamatos Organization: Resident/home owner

Address: 4260 Hargrave Ave Santa Rosa, CA 95407

Comment: How can the city of Rohnert Park brings in sewer line to the casino site when it is not approved yet?? Who paid who?

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(Please write legibly)

Name: Anguleta Tuguanates-delope Organization: Resident home owner

Address: 4760 Hargrave Ave

Comment: I strongly disagree with this projects location. It will cause crime, traffic, flooding and dry wells. It is not okay to plug of the flood zone to our properties. Sonoma countyroads can not handle it traffic nor can it handle any more traffic. It is not okay to take ground water from existing wells. For our mound and septic system our properties have to drain the lagoon and not be plugged off. People who have to pay for their gambling habit will cause crime!

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(Please write legibly)

Name: Suzanne Hywellynne-Anderson Organization:

Address: 886 Holly Ave Rohnert Park, CA 94928

Comment: I think it is important to make sure the Department of Defense and CAL-EPA make sure the casino location and land around it are free of hazardous and toxic waste left by a WWII Military Installation, Machine Gun firing range, drag strip and Oil (Shell oil) testing facility.
To develop this casino/resort without a clean-up would be illegal and unconscionable.

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(Please write legibly)

Name: John W. DeLair Organization: Mobile home owner

Address: 46 Verde Cir. Rohnert Park, Ca 94928

Comment: I am Against the Casino Coming to Rohnert Park, (1) If Rancheria Casino Comes to Rohnert Park they will not pay a dime to Sonoma County or Rohnert Park unless they Recieve a profit. If they dont show a profit then they are not obligated to pay anything @ all. It will Cause flooding @ Rancho Verde M.H.P. please take this Concern Seriously.

Thanks

John W. DeLair

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(Please write legibly)

Name: Helene Facinelli Organization: Business Owner

Address: 7465 ADRIAN PL RP 94928

Comment: I think the casino will bring more revenue to city.
I don't think it will corrupt any one as a real gambler will go somewhere to gamble

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(Please write legibly)

Name: NATHAN BOTWINIK Organization: Verian Pool Technologies LLC

Address: 475 NOONAN ANCH WAY

Comment: Santa Rosa CA 95403

YES – JUST MITIGATE FOR WETLANDS & LIGHT SUMMARY.

NB

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(Please write legibly)

Name: LeHee White Organization:

Address: 722 Howard St Santa Rosa Ca 95404

Comment: We in Sonoma County do not have enough water currently for the residents - if the Casino is built there will be no water for the home owners in the west county using well water - which home owner can compete with 1000 ft. wells?
the original Graton tribe was 3 people - I don't think they were able to envision & finance this tremendous project with the help of Las Vegas.
What about the quality of life in Sonoma? There is a hospital & already we do not have enough trauma beds - the Emergency Room will not be able to handle the increased number of patients.

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(Please write legibly)

Name: Todd MARTIN Organization: I POC.

Address: 251 - STARdust PL. # B ALAMEDA CA 94501.

Comment: I Really Don't See WHAT THE problem IS. IF THE CASANO IS BUILT. IT Would BENNIFIT THE COMUNITY More THEN PLAYCATE IT. IT would CREATE JOBS AN REVNUE. AS far AS Bringing CRAME well we ALL KNOW THATS NOT TRUE CRAME IS ALRedy Here,

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(Please write legibly)

Name: Kathalina Fuentes Organization: IPOC

Address: 2515 Stardust Place #B Alameda, CA 94501

Comment: This is Coastal Miwok traditional Homeland. The Native People have every right to put up any type of Business Place that they want. Crime is already here! A Casino would offer job opportunity, and bring more money to Sonoma. I understand that it will be worked by Union which is higher paying rate and benefits this is positive future goal. Re: Water un-dam the water, water is a natural resource learn it. Casinos is a (promise) to Native Americans as a courtesy notify the public and get comments. No matter where the site is, there will be large complaints

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(Please write legibly)

Name: Tim Organization:

Address:

Comment: The native Americans have a right to own their own business, but why must it be a casino? Why can't it be a shopping mall or something like that? I would be **for** this project if they planned to build a mall, but I hate casinos, and it's not just here in Sonoma county or about the natives. I am against casinos ANYWHERE, and I don't care WHO builds it! No matter whose casino it is or where it is, it can never do any good.

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(Please write legibly)

Name: Elizabeth Moss Organization:

Address: 7247 Circle Dr Rohnert Park, CA.

Comment: Please consider existing greenbelt requirements. The fact that we have raped the country in the past is no excuse to continue doing it. Building the casino is just a continuation of the greed and lack of regard for the earth that has been our history. The general plan is an attempt to stop the irresponsible building of the past. The casino ignores it.

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(Please write legibly)

Name: Samanthe Reelock Organization: Citizen

Address: 876 Scenic Avenue Santa Rosa, Ca 95407

Comment: I live West of where you are proposing the property. At 64 feet I will lose my well with your building for 360 Bed Hotel.
With Increased traffic. I would be unable to cross Stony Point to go north. We will be prisoners in our home!
Our Neighborhood floods Run off goes to the Lagoon by the Casino it will increase & make it impossible to get home My House will flood, Please Consider Another Site!

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(Please write legibly)

Name: Jenay McIntyre Organization:

Address: 3510 Phillips Ave Santa Rosa, Ca 95407

Comment: To Build a huge Casino, Hotel, homes ECT ON this proposed acreage would be a crime. It is Wetlands, it Floods badly in that area. The Rancheria says it will fix the Flooding, thats Impossible! The traffic is already horrible. Why put a Casino so close to all these citys. The people against the Casino far outnumber the ones who want it. Find a place where the locals want the Casino

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(Please write legibly)

Name: Marcellina Becerra Organization: Individual Pomo/Miwok

Address: 2820 Seneca Lane Santa Rosa

Comment: I totally support the Graton Rancheria endeavor.

Natives were never asked about environmental issues until it impacted the abusers.

Natives respect the earth. THE environ-

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Mental Laws are the problem.
Nations have been asking to stop
the erosion and rape of the
earth. Some have decided to
join with respect to the earth
through economic development
I just - we are the original
keepers of the earth.
Could this be "Environmentalists"
Thank you for your presence.
Marce

WRITTEN COMMENT CARD

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NATIONAL INDIAN GAMING COMMISSION – PUBLIC SCOPING MEETING

FEDERATED INDIANS OF GRATON RANCHERIA – HOTEL & CASINO PROJECT

Luther Burbank Center for the Arts, Ruth Finley Person Theater
March 10, 2004

IF YOU WOULD LIKE TO SUBMIT A WRITTEN STATEMENT, PLEASE COMPLETE THE FOLLOWING INFORMATION AND COMMENT IN THE SPACE PROVIDED BELOW. GIVE TO ATTENDENT OR DROP IN THE WRITTEN COMMENT BOX. COMMENTS MAY ALSO BE SUBMITTED BY MAIL TO THE ADDRESS LISTED BELOW.

(Please write legibly)

Name: Dennis Carrera Organization:

Address: 803 Millbrae Ave. - Santa Rosa, CA 95407

Comment: I have lived my entire life, 54 years, in this neighborhood. The idea of a CASINO being placed on the proposed site is NOT ACCEPTABLE!! Our area floods immediately after even 2 to 3 inches of rain and more. My other concern is traffic on our rural residential roads. Currently the traffic is horrendous — a casino/hotel will vastly increase traffic in an area that is already impacted. Lastly, water is a concern, as I am on a well 130 feet deep.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

WRITTEN COMMENT CARD

682

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(Please write legibly)

Name: J. GERRANS Organization:

Address: 782 - MILLBRAE AVE S. R.

Comment: A DEEP WELL WILL NOT WORK, IN THE 80" R.P. DUG A WELL TO 800' AND RAN INTO HOT WATER 170° + LOADED WITH BORON THEY ABANDED IT BECOUSE OF THIS.

I HAVE A WELL AT 200 FT AND would LOSE my WATER IF THEY WERE TO PUMP A MILLION GALLONS A DAY.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

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(Please write legibly)

Name: Jacqueline Mendoza Organization: Citizen

Address: 11144 Bodega Hwy., Sebastopol, CA 95472

Comment:

I agree with Lynn Woolsey – building this Casino goes against the Sonoma County Building Plan – we are primarily rural – agricultural and not zoned for casinos –

please stop this building – thank you.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

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(Please write legibly)

Name: Cynthia Cunningham Organization: (Retired Fire Captain) private citizen

Address: 5726 Henning Rd., Sebastopol, CA 95472

Comment: Casino will negatively impact traffic, safety & quality of life far beyond financial mitigation offered by tribe

Adamantly opposed building casino on this sight. Another site should be found in keeping with Sonoma County General plan.

Please give to attendant, drop in Written Comment Box, or mail to: National Indian Gaming Commission, Attention: Christine Nagle, 1441 L Street NW, 9th Floor, Washington, D.C. 20005. Please include your name, return address, and the caption: "DEIS Scoping Comments, Graton Rancheria Casino Project".

685

RINCON VALLEY FIRE PROTECTION DISTRICT

91 Middle Rincon Road, Santa Rosa, California 95409-3406
Business (707) 539-1801 FAX (707) 539-3046

DOUGLAS WILLIAMS
Fire Chief

JOHN LANTZ
Assistant Chief

March 25, 2004

Christine Nagel
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005

Subject: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle,

The Rincon Valley and the Rancho Adobe Fire Protection Districts would like to submit the following comments related to the potential impacts of the proposed Graton Rancheria Casino Project for the Draft Environmental Impact Study. The subject property is currently within the Rincon Valley Fire Protection District and is immediately adjacent to territory served by the Rancho Adobe Fire Protection District.

The impacts and comments identified at this time include the following:

1. Evaluate the need for additional public services, including fire, police, or other emergency services, resulting from the project and the capability of existing service providers to accommodate the additional demand.

2. What entity will be responsible for providing fire response to the project? What is the current capacity of that provider? Evaluate the project's need for services, and how will services to the casino and hotel complex impact services to other residents and businesses in the affected area.

3. What entity will be responsible for providing ambulance response to the project? What is the current capacity of that provider? Evaluate the project's need for services, and how will services to the casino and hotel complex impact services to other residents and businesses in the affected area.

4. What entity or entities will be responsible to provide other emergency services to the project, including hazardous materials spills or in the event of disasters other than fires (flooding, earthquakes, and major vehicular accident blocking ingress/egress to facility)? What is the current capacity of those providers? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

5. What type of mutual aid response may be required for various emergency response issues (including fire, ambulance, and other emergency response scenarios), and what entities would be impacted? What is the current capacity of those emergency response providers and hotel complex impact services to other residents and businesses in the affected area?

6. What entity will be responsible for providing 9-1-1 emergency dispatch services to the project? What is the current capacity of that provider? Evaluate the project's need for services, and how will services to the casino and hotel complex impact services to other residents and businesses in the affected area.

7. If the project is to be served by local resources it will be critical to insure that all building plans are properly reviewed for consistency and compliance with local codes.

8. What type of built-in fire protection will be installed in the project?

9. What entity will provide fire plan review and inspection services for the construction of the project?

10. Will the project comply with fire code inspection and fire code enforcement? If so, what entity would be the "Authority Having Jurisdiction" as indicated in the model fire codes?

11. What fire standards will the project comply with? Will the Tribe agree to comply with the Sonoma County Fire Code?

12. Which building codes will the project comply with? Will the Tribe agree to comply with Sonoma County's building standards?

13. How will the project comply with federal, state and local hazardous materials regulations? Which entity will be responsible for regulation enforcement?

14. Evaluate the potential for exposing people to hazards from fire and hazardous materials during construction and during normal business operations? What mitigation measures will be taken?

15. The anticipated size of the facility indicates the need for a well-prepared staff that is able to properly react, report, and respond to a variety of emergency situations. What will the capabilities of the staff be?

16. The additional facilities and equipment necessary to mitigate the impact of the project, both on-site and off-site, need to be considered. This could include both an increase in the number of existing resources and the provision of resources uniquely adapted for the facility.

17. The impact of revenue loss associated with the project needs to be considered. This would include both the loss of current revenues and future revenues associated with development.

Thank you for allowing us to comment on the Draft Environmental Impact Study. If you have additional questions please contact Chief Doug Williams at (707) 539-1801 or Chief Vern Losh at (707) 565-1152.

Respectfully,

Douglas A. Williams
Fire Chief
Rincon Valley FPD

Vernon A. Losh II
Fire Chief
Rancho Adobe FPD

Paul D. Stutrud
P. O. Box 2205
Rohnert Park CA 94927-2205

27 February - 9 March 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington DC 20005

Re: **DEIS Scoping Comments, Graton Rancheria Casino Project**

Dear Ms. Nagle:

I have been a resident of Rohnert Park for 19 years. I have been very involved in the community, particularly in matters regarding the state-required General Plan and its subsequent Elements, which include: Circulation, Open Space, Housing, Safety, Conservation and Land Use. I have also filed complaints with the Sonoma County Grand Jury regarding complaints about how Rohnert Park does not do things according to the Government Codes and other state laws and policies. Four of those Grand Jury Complaints were investigated and published. I will provide copies of them upon your request.

Regarding the proposal by the Graton Rancheria Indians and Stations Casinos of Las Vegas, Nevada to build a hotel and casino on the particular piece of property that lies east of Stony Point Road and north of the Rohnert Park Expressway, in my educated opinion, is one of the worst sites that could have ever been chosen.

For as long as I have lived in Rohnert Park and I am sure for many previous years, the site at Stony Point Road has been plagued with problems of flooding in the winter time. The road leading to the proposed casino site include: Rohnert Park Expressway, Wilfred Avenue, Todd Road, Stony Point Road. There are no mitigations for the problems of water flooding.

Another problem, that I first learned about when I first moved into Rohnert Park is with the water wells that supply the citizens of Rohnert Park. As early as 1985, I was hearing complaints of "brown" water and "smelly" water from the folks who live in 'G' Section.

> (For your information, the city of Rohnert Park is divided up into section. Each section has its streets named with words that all belong with the same letter. Streets in 'A' Section such as 'Adele', 'Alden' and 'Almquist' or in "C' Section the streets have names beginning with the letter 'C' such as 'Cairo', 'Cornell' and 'Calcutta' and, of course, the streets in 'G' Section all begin with the letter 'G' such as "Gladstone", "Greywhaler", etc.

The wells in 'G' Section were closed down. But there have been reports of 'brown' or 'smelly' water in 'F' and 'H' Sections. Shortly after moving into my home in 'H' Section I had a good example of the brown water problem.

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NATIONAL INDIAN GAMING COMMISSION
2004 MAR 15 PM 5:08

One morning I was going to wash my car. I went into the downstairs bathroom and put a bucket under the bathtub outlet. Dark brown water came out and filled the two gallon bucket. Since I had never lived in a house that used well water I was a little surprised. I figured that maybe the plumbers had left the feeder pipe uncapped before connecting it to the house and some dirt had gotten into the line before it was connected. I connected a hose up to the water heater in the garage and ran it out to the front lawn. I shut the water heater off, shut off the input valve and opened the valve to drain the water heater. When I went back out to the end of the house I noticed course sand coming out of the hose. I ran back in the garage and grabbed a bucket and stuck the hose in the bucket. In the time it took to drain the water heater the bucket was half filled with sand. I took a sample in a jar and the next day went down to the Rohnert Park Public Works department.

I was told that the water in Rohnert Park is not filtered as it comes out of the well, as the reason for the sand. I was told that the brown water was caused by iron oxide and manganese. If I didn't like it, I should install water filters at my house. I did.

I have been changing water filters on my house since 1985. I have also noticed that the frequency of changing seems to be seasonal. In the month of July I have had to change water filters every week because there was so much crud in them. On the other hand, I only have to change filters every two or three months during the winter.

About ten years ago, I really got interested in Rohnert Park's well water problem after being requested to act as a witness and complaintant about the matter of a contaminated soil problem that was about 100 feet from Rohnert Park's Well 15. I atteneded some meetings at the State of California Water Quality Control Agency and was astounded by testimony by the City of Rohnert Park's City Engineer, Roland Brust. In a few words, he said, "I could care less about the proximity of the contamination site."

Mr. Brust was under the impression that the City of Rohnert Park was soon going to be getting all of its water from the Sonoma County Water Agency, which is drawn from the Russian River.

Although the City of Rohnert Park does get some water from the Water Agency it is still using more well water than Water Agency water. The ratio is about 20% from the Agency and 80% from well water. It is not as simple as that though.

Rohnert Park also obtains water from the City of Petaluma via the North Marin Water District. This water is a 14% surplus of Petaluma's water allotment from the Sonoma County Water Agency. With this 14% allotment. the City of Rohnert Park draws 400% of its allotment from the Water Agency.

According to the **Rohnert Park General Plan**, Rohnert Park uses more than **4 million gallons of ground water a day**. Also according to the **Rohnert Park General Plan**, the **recharge rate** for the underlying aquifer is only **1.6 million gallons a day**. In other words, Rohnert Park is drawing out more than double the water than is being replaced. I should also mention that out of this same aquifer, Sonoma State University is drawing water, along with the City of Cotati, the unincorporated area called Canon Manor and a lot of private homes.

According to published information, **the water table level has dropped 150 feet**. It is not recovering.

In fact, a lawsuit was filed and settled in September of 2002 about the excess water use and the false information published in the Environmental Impact Report for the new Rohnert Park General Plan.

Hundreds of wells have gone dry in the area around Rohnert Park. These wells are marked on a couple of maps that will probably be presented by another speaker at this hearing.

How does this relate to the proposal to build a casino and hotel on the site at Stony Point and Wilfred Avenue? There is simply not enough water for the people already living in this area.

Of course, this seems strange when the same area becomes an annual flood plain. But there is a lot of substantiation.

There are many other things that do not make this specific and particular site for a casino and a hotel viable.

Five federally listed endangered species, including the Tiger Salamander, are found on this property. There are vernal pools that are protected by the State of California. The property is in the Williamson Act (an agricultural preserve act) and is part of the Urban Separator designation that is part of the Sonoma County General Plan and I believe is a state policy to have undeveloped property separating cities.

There is a drainage canal, deeded to and owned by the Sonoma County Water Agency, that runs diagonally across the property that is a part of the flood control drainage system. The site of the property regularly gets flooded after rainstorms and acts to prevent or minimize flooding to the east which includes 'F', 'G' and 'H' Sections inside the city limits of the City of Rohnert Park.

I have taken photographs and videos of the area during the last storms in Sonoma County. I have a collection of photographs showing water overflowing the above mentioned drainage canal, as well as several scenes of flooding on the roads that lead to the casino site.

Some of the **roads had to be closed** because of the depth of the flood water, this includes the **Rohnert Park Expressway** in the area just west of the Rancho Verde Mobile Home Park. I am aware of several other people who have also taken photographs or made videos of the flooding. I will make my photographs and videos available upon request.

These are specific questions in regards to the proposed site for the Graton Rancheria casino project. I would appreciate a response to each question.

1). **How are the five federally listed endangered species found on the described Graton Rancheria casino site going to be handled**?

(a) Will there be an appropriate investigation by an appropriate authorized agency to determine that each of the **five federally listed endangered species** do actually exist on the proposed property?

2) Will a separate investigation be done to the viability and the actual existence of **vernal pools** be done on the proposed casino property site?

(a) Will this investigation be done by a federal or state agency?

3) I understand that the proposed casino property site is currently in the **Williamson Act**. Will an appropriate verification be done and if it is found that the property is indeed in the Williamson Act designation, will the appropriate state laws regarding removal be followed? I believe this includes a hearing by LAFCO (Local Agency Formation Commission) for the appropriateness of changing the zoning designation from agricultural to something else (a casino and hotel).

4) Will the process for changing the zoning go through the normal and usual General Plan amendment process with the Sonoma County Planning Commission and the Sonoma County Board of Supervisors?

5) There is a drainage canal that runs somewhat diagonally essentially north to south that is deeded to the Sonoma County Water Agency. There are limitations to access to the drainage canal property that are strictly agricultural. This drainage canal cannot be eliminated or changed because of its importance to draining flood waters that are generated to the east and wend their way westward to intersect the North Branch of the Laguna de Santa Rosa.

6) In past years, the north and north east sections of Rohnert Park ('G' Section, 'F' Section and 'H' Section) have had episodes of flooding. In the recent rain season, 'G' Section had serious flooding. At the same time the fields of the proposed casino site have also been flooded by the overflow of the drainage canal that runs across it.

My question is in regards to what will be done to relieve this flood prone a rea in the future? We are talking about a tremendous about of water. Water that has historically flooded the lands from the base of the Sonoma Mountain all the way down to and past Stony Point Road.

7) What will be done about the annual **flooding closure** of the **Rohnert Park Expressway** just west of the Rancho Verde Mobile Home Park?

8) What will be done about the annual **flooding closure** of **Wilfred Avenue** in the area where Primrose intersects Wilfred?

9) What will be done about the **flooding problem** on **Scenic** and **Todd Avenues**?

10) What about the current and future matter of adequate ground water? The casino project is supposed to drill 1,000 foot deep wells. When we start having even more land mass subsidence from the collapse of the aquifers, will the Graton Rancheria and Stations Casino pay for the damages?

In a few words, this is one of the poorest sites for any kind of construction.
I will be presenting a copy of this letter to the hearing on the 10th. I will also include a copy of a video tape of the flooding problems I addressed in this letter.

Thank you,

Paul D Stutrud

Paul D. Stutrud

I am also enclosing two documents that just came to me. They are in regards to the U.S. Military's (Navy) use of certain lands adjacent to the proposed casino site and the contamination left behind.

Subject: Fw: 03/09/2004 PRESS RELEASE: TOXIC WASTE THREATENS TO DERAIL CASINO PROJECT
From: "Montgomery/Jackson" <DONEGAL@peoplepc.com>
Date: Tue, 9 Mar 2004 14:49:26 -0800
To: <donegal@peoplepc.com>

Sent: Tuesday, March 09, 2004 10:20 AM
Subject: 03/09/2004 PRESS RELEASE: TOXIC WASTE THREATENS TO DERAIL CASINO PROJECT

Stop the Casino 101 Coalition

ttt

Sonoma County, California

www.stopthecasino101.com

FOR IMMEDIATE RELEASE: March 9, 2004: 10:00 a.m.

CONTACT: Marilee Montgomery

MILITARY TOXIC WASTE THREATENS HEALTH OF AREA RESIDENTS, PLACES ROHNERT PARK CASINO PROJECT IN JEOPARDY

ROHNERT PARK, CA: A World War II naval air station in Rohnert Park poses a threat to human health and safety, and has probably contaminated most, if not all, of the proposed Rohnert Park casino site.

According to a U.S. Army Corps of Engineers report obtained by the Stop the Casino 101 Coalition, the formerly used defense site, or FUDS, has been identified by the Department of Defense as being contaminated with waste that includes at least one 1,000 gallon underground gas and/or oil storage tank, unexploded ordinance, and lead from a firing range. The suspected contaminents include known carcinogens as well as lead, which is highly-toxic.

A report prepared by Environmental Geology Services, an environmental consulting firm located in Santa Rosa, indicates that the site poses a threat to human health and the environment, and the toxic contaminents have most likely spread to the surrounding countryside, including the casino site, which is immediately adjacent to and down-gradient from the old air base.

The area's groundwater supply may also have been contaminated, since the groundwater also flows downhill and west from the site, again, directly across the casino site. Casino developers plan to sink multiple 1,000 to 2,000 foot wells to supply the millions of gallons of water that the casino would require every day. .

The report also cites evidence from old aerial photographs that appear to show the existence of "ground scars". Ground scars mark areas of man-made disturbances of the earth, and are used by the Department of

Defense to locate burial pits, "dry wells" and trenches commonly used by the military to bury waste, rubbish, and, at the end of the war, surplus materials of all sorts. These pits were routinely filled with highly-toxic materials. The ground scars, which are of significant size, are located on the casino site itself.

In addition, the Rancho Verde Mobile Home Park is apparently located directly on top of the firing range, which was used by both the Navy as a machine gun range and by the Sonoma County Peace Officers Association for several years after the war. It is estimated that millions of pounds of lead were deposited in the soil during the years the range was in use. According to the report, the cost to clean up the firing range area alone could run to the tens of millions of dollars.

Citing the hazard to the health of area residents, Pastor Chip Worthington delivered copies of these findings to the Sonoma County Board of Supervisors and County Counsel today, and will meet with the Board at 2:00 p.m. this afternoon. This evening, he will address the Rohnert Park City Council to have the information read into City records.

Pastor Worthington will urge both the County and the City to ask the Department of Defense to perform the extensive on- and off-site testing of soil and groundwater supplies that will be required before any clean-up can begin. The process of testing alone can take years to complete, with clean-up taking years more, if and when funds become available for the work.

From what the Stop the Casino 101 Coalition has been able to learn from the US Army Corps of Engineers in Sacramento, there are no funds available for this project, a fact which has been confirmed by California's Department of Toxic Substances, which has begun it's own investigation into the matter.

The Department of Defense, which is the agency responsible for the clean-up of such sites, has recently been under fire by Congress and the GAO for consistently underestimating both the levels of contamination and the cost of clean-up for these old defense sites.

The City of Rohnert Park meets Tuesday evening at 6:30 p.m. in Council Chambers in City Hall at 6750 Commerce Drive, Rohnert Park.

Pastor Worthington, Attorney for the Coalition Marvin Pederson, and Press Liaison Marilee Montgomery, who discovered the existence of the air base and who did the preliminary research, will be available for interviews today.

ENDS

March 3, 2004

Mr. Marvin Pederson
Attorney at Law
1815 5th Street, Suite 200
Santa Rosa, CA 95401

RE: PRELIMINARY REVIEW
POTENTIAL HAZARDOUS MATERIALS IMPACTS
FORMER U. S. NAVY COTATI OUTER LANDING FIELD
AND DOWN GRADIENT AREAS
RHONERT PARK, CALIFORNIA

To Whom It May Concern:

This review and letter has been prepared in accordance the request of Mr. Chip Worthington.

PURPOSE AND BACKGROUND

The purpose was to conduct a preliminary review of some of the readily available information regarding the site history of the former U. S. Navy Cotati Outer Landing Field (Cotati OLF). The focus of this preliminary review is on potential hazardous materials impacts at and adjacent to the Cotati OLF from past military activities, specifically with regard to the proposed casino development west of the Cotati OLF. State and local regulatory agencies should be aware of potential hazardous materials impacts to the area.

Previous military use of the site is of potential concern because of possible future development of parts of the Cotati OLF and down gradient areas. Past site use may have resulted in hazardous materials impacts that may adversely impact area residents during construction, and might have possible negative impacts to future occupants of developed projects. Additionally there is concern that potential environmental conditions could adversely impact workers during construction activities. Military activities at the Coati OLF may have potentially impacted adjacent and down gradient areas such as the proposed casino site and these potential impacts should be more clearly defined and remediated prior to development.

SCOPE OF WORK

For this preliminary review the scope of work was limited to the following:

1. Review background summary history prepared by Marilee Montgomery,

2. Review available stereo pair air photos of the site and area (June 12, 1956, AV222-03, frames 8 & 9, scale 1:24,000, and later years),
3. Review U. S. Army Corps of Engineers Memorandum to Vincent Del Greco from Mark C. Charlton, dated September 10, 1999
4. Review report on Cotati OLF by TechLaw, Inc. prepared for the U. S. Army Corps of Engineers, Sacramento District, dated September 1999.

SUMMARY OF FINDINGS

Based on the results of the above review it is our opinion that the Cotati OLF has the following characteristics:

- ❑ The Cotati OLF consisted of two parcels of land: a 218.25 acre parcel and a 74.85 acre parcel. The 218.25 acre parcel was apparently the main airfield, but the location of the 74.85 acre parcel has not yet been determined.

- ❑ The Cotati OLF was operated by the U. S. Navy from approximately 1944 through 1949 and the facility included two runways, a crash and fire truck building, barracks, a control tower, oil and gasoline storage, small arms magazine and a machine gun range.

- ❑ Fuel testing was conducted at the facility by Standard Oil of California from 1957 to 1958 after it was declared excess government property. Also in the 1950's and later it was used as for drag racing and sports car racing.

- ❑ In 1983 the U. S. Army began identify inactive military facilities to be evaluated for possible toxic waste and hazardous materials issues. Aproximatly 90% of these facilities known as Formerly Used Defense Sites (FUDS), have been evaluated for clean up eligibility. Issues of concern at FUDS depend on past site activities and include: fuels and solvents in ground water, buried explosives and ordnance, asbestos, dump sites and lead contamination. The Cotati OLF was identified as a FUDS by 1996 and in 1999 the former Navy base was determined eligible for the FUDS mitigation program.

- ❑ LawTech was retained by the U. S. Army Corps of Engineers to assess the property (referred to as the 216.95 acre parcel). Their report makes reference to an oil storage building, gasoline storage, a small arms magazine and a machine gun range located on the facility, and underground storage tanks. The report indicated two categories of remedial / clean up projects: OE - Evidence of ordinance storage. Recommends finding the locations of waste sites that may

contain unexploded ordnance, and CON/HTRW - Evidence of underground gasoline storage tanks. Recommends locating tanks and testing soil for possible contamination. For some reason they did not discuss lead contamination impacts from the machine gun firing range.

- Analysis of stereo pair air photos of the Cotati OLF taken in 1956, some seven years after Navy operations show the runways, access roads, probable aircraft machine gun test range berm (near west end of runway), and remaining buildings / building pads. The property from the west end of the runways to Stony Point Road are pockmarked with numerous circular, crater like features, and this area contains a larger area of disturbed soil. Although the origin of these features is not known, they could be related to previous military activities such as waste disposal or ordinance disposal. These areas are down gradient from the runways and appear to be outside of the 218.25 acre parcel comprising the main Cotati OLF. This area might contain the previously referenced 74.85 acre parcel.

CONCLUSIONS

The U. S. Army Corps of Engineers records show the Cotati OLF site as a declared potential hazardous waste site which has been recommended for further exploration and possible remediation. The presence of the Cotati OLF has the potential to impact adjacent and especially down gradient property such as the area of the proposed casino development.

Although the amount of aircraft maintenance was performed at the site is not known, if chlorinated solvents were used (a common WW-II era practice in aircraft parts cleaning) both shallow and deep ground water resources could be impacted. These kinds of liquid hazardous wastes were typically disposed of in on site "dry wells".

To date no known effort has been made to locate the underground storage tanks (USTs) and determine their impacts to the local ground water. Underground fuel tanks from this era have a high potential to have leaked and caused contamination to the shallow ground water with compounds that include benzene, toluene, xylenes and ethylbenzne.

As with the USTs, no known effort has been made to locate possible buried unexploded ordinance, even though this has been recommended by the U. S. Army Corps of Engineers contractors.

The location of the machine gun range has not been verified or explored with regard to lead contamination. However our preliminary air photo review suggests there was a berm off the western end of the runways that may have been used for testing aircraft machine guns.

Because of the known and suspected hazardous materials characteristics of the Cotati OLF and its proximity to the proposed development to the west (including the proposed casino project) the U. S. Army Corps of Engineers in cooperation with the Sonoma County Environmental Health Division, the California Department of Toxic Substances Control, and the North Coast - Regional Water Quality Control Board should make it a priority to:

- ❑ Locate the USTs and explore the vertical and lateral extent of possible ground water contamination, especially with regard to benzene a significant constituent of gasoline and a known carcinogen. If present, this contaminant has the potential to impact existing and future water wells in the area and down gradient form the former USTs.

- ❑ Analyze soil and water samples for chlorinated solvents during the soil and ground water exploration for the USTs. This would be prudent since if present, chlorinated solvents could impact deeper ground water zones and impact the regional ground water resource. In addition further historical research, in conjunction with a soil gas screening survey should be done to determine locations of aircraft maintenance activities and identify related solvent waste disposal sites.

- ❑ Conduct the necessary research to locate/ verify the former machine gun range and undertake a through soil exploration and testing program. If this site is in the area of proposed future development there could be significant human health risks to construction workers and down wind residents due to lead dust exposure. Once the machine gun range is identified the area should be properly explored and sampled, and remediated before any development to mitigate this potential health risk. Based on the available information on the period of use of the range and the resulting amount of lead (as well as phosphorous from tracer rounds), remedial costs could be in the millions to 10's of millions of dollars, depending on the volume of soil and the area of dispersal.

- ❑ Conduct the necessary research to locate potential buried ordinance and remove and safely dispose of these materials if found. If these potential disposal sites are located in proposed development areas, they could pose a high risk to construction workers and subsequent facility occupants.

- ❑ The U. S. Army Corps of Engineers in conjunction with County and State agencies should make it a priority to conduct the necessary research to identify the locations of the reported and suspected hazardous materials impacts to the Cotati OLF, explore and define the extent of off site impacts to soil and ground water (deep and shallow) and conduct the necessary remediation. As development is encroaching on the undeveloped property in the area it would be prudent to locate and

remediate any hazardous materials related to the former military activities as soon as possible. The time to conduct the needed research, investigation and possible remedaition could take a few to several years.

LIMITATIONS

This work has been performed in accordance with generally accepted environmental review practices for similar preliminary reviews conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

The scope of work performed to complete this preliminary information review was limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or wastes, we also must alert the reader that this review may not reveal hazardous materials releases that have occurred. Also, site conditions can change with time, and our assessment was not intended to predict future site and off site conditions. Because of the limited nature of this review, site history was developed based only on information provided and a review of limited government documents. This report is not a risk assessment and the Scope of Work provided does not include a determination of the extent of, nor the environmental or public health impact of, known or suspected hazardous materials or wastes.

It is understood by the parties hereto that the Client who has requested this review will use the report (in addition to other information) to provide information to local and state public agencies to assist those regulatory agencies in making decisions about development of property at and near the Cotati OLF. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of properties that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety.

CLOSURE

I trust the foregoing preliminary evaluation and opinions are sufficient for the State and County regulatory agencies to determine if they should, in the public interest, follow up on these environmental concerns. If you or the regulatory agencies involved have any questions, please give me a call.

Sincerely,
ENVIRONMENTAL GEOLOGY SERVICES

Marc W. Seeley, RG, REA-II
Principal Geologist

WESTON BENSHOOF
ROCHEFORT RUBALCAVA MACCUISH LLP
ATTORNEYS AT LAW

(213) 576-1005
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March 10, 2004

VIA U.S. MAIL

Ms. Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW 9th Floor
Washington, D.C. 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

This firm represents the O.W.L. Foundation ("O.W.L."). O.W.L. is a non-profit organization that advocates for responsible public decision making when agencies take actions that may have significant impacts on scarce natural resources such as open space and local groundwater supplies.

These scoping comments and related information are submitted in opposition to the proposed Graton Rancheria Casino Project (the "Casino Project"). In addition to the many other social and environmental concerns being voiced against the Casino Project, it should not be approved because it is proposed for development in an area of Sonoma County where groundwater supplies are already being critically overdrafted.

The simple fact is that a sufficient and sustainable water supply does not exist to serve the proposed Casino Project in addition to existing and future water needs in the area. The prevailing water crisis for this area of Sonoma County has been acknowledged by various public agencies, including, but not limited to, the Sonoma County Water Agency and the City of Rohnert Park, and is well documented by the records and information that are submitted herewith by reference for inclusion in the public record that your agency is assembling in connection with the proposed Casino Project.

Prior to taking any action with respect to the Casino Project, your agency should review, at a minimum, and in no particular order, the following documents

relating to the prevailing local and Countywide water supply scenario to determine whether the Casino Project has the potential to cause negative impacts to the human environment:

- Entire administrative record for the Sonoma County Water Agency Water Supply and Transmission System Project (an exemplar table of contents for the administrative record is included herewith as Attachment A), including, but not limited to:
    - The proposed New Master Water Supply Agreement.
    - Eleventh Amended Agreement for Water Supply.
    - Tenth Amended Agreement for Water Supply and Construction of the Russian River-Cotati Intertie.
    - All prior amendments to the Water Supply Agreement.
    - Supplemental Water Supply Agreement.
    - 2001 Memorandum of Understanding Regarding Water Transmission System Capacity Allocation During Temporary Impairment.
- All other files held by the Sonoma County Water Agency concerning water quality and water supply issues, including, but not limited to, files concerning:
    - All past and present Water Contractor Agreements and other water supply contracts, agreements, and documentation, including those relating to Warm Springs Dam;
    - Available and forecasted surface and ground water supplies.
    - Land surface deformation (i.e., subsidence and uplift).
    - Designated areas of natural recharge.
    - Groundwater level data.
    - Water quality data regarding the Laguna de Santa Rosa wells.

  - Water pollution, contamination, and toxicity.
  - Historic and current water quality monitoring data.
  - Flood data, floodplain maps, and flood control projects.

- 2000 Sonoma County Urban Water Management Plan.
- "Evaluation of Groundwater Supply Alternatives Water Supply and Transmission Project" prepared for the Sonoma County Water Agency by Parsons Engineering Science, Inc. (1995).
- All files held by the Sonoma County Health Department concerning studies, reports, and complaints regarding areas of contaminated water, and water contamination, degradation, pollution, or toxicity in Sonoma County water supplies, including Well Drillers Reports on water quality.
- All files held by the California Department of Health Services concerning studies, reports, and complaints regarding water quality of Sonoma County water supplies.
- All files held by the Sonoma County Permit and Resource Management Department concerning available water supplies and water quality concerns, including, but not limited studies, reports, evaluations, determinations, and Well Drillers Reports.
- All files held by the California State Department of Water Resources concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.
- All files held by the United States Geological Survey concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.

- United States Geological Survey "Map Showing Ranges in Probable Maximum Well Yield from Water-Bearing Rocks in the San Francisco Bay Region, California" (1972)(D.A. Webster, Miscellaneous Field Studies May, MF-431).

- United States Geological Survey "Groundwater Atlas of the United States, California and Nevada" (2003) (http://ca.water.usgs.gov/groundwater/gwatlas/reference/index.html).

- All contracts by the United States Geological Survey, County of Sonoma, and Sonoma County Water Agency for all studies and evaluations of surface and groundwater supplies in Sonoma County.

- The Sonoma County General Plan.

- Entire administrative record concerning the Sonoma County General Plan Update for Year 2020, including all documents and public testimony regarding the Water Resources Element.

- All files held by the City of Rohnert Park concerning the City's General Plan, Specific Plans, and all related amendments in relation to City water supplies and water quality, the 2000 Final Environmental Impact Report prepared for the City's 2000 General Plan (including studies, evaluations, and consulting work prepared in connection with the 2000 FEIR in relation to City water supplies, such as the study performed by PES Environmental, Inc.), City groundwater well logs, land surface deformation (i.e., subsidence and uplift), water level data, water quality data, the City's letter request to the Sonoma County Water Agency to implement a Groundwater Management Plan (dated October 22, 2002), and the Sonoma County Water Agency's letter denial to implement a Groundwater Management Plan (dated November 26, 2002).

- The 1984 Penngrove Specific Plan.

- Entire administrative record and resulting Settlement Agreement relating to the 2002 Sonoma County Superior Court case entitled South County Resource Preservation Committee and John E. King v. City of Rohnert Park, Case No. 224976.

- Entire administrative record concerning the City of Santa Rosa Board of Public Utilities Incremental Recycled Water Program, including, but not

limited to, all resolutions, environmental documentation, studies, reports, public comment, and presentations.

- Year 2001 Senate Bills 221 and 610 (codified at relevant provisions of the California Government, Public Resources, and Water Codes).

- The 2003 Kleinfelder Report prepared for the Sonoma County Water Agency addressing water scarce areas of Sonoma County including Bennett Valley, Mark West Springs, and Joy Road Area.

- The published Court of Appeal decision in Friends of the Eel River, et al. v. Sonoma County Water Agency, et al. (2003) 108 Cal.App.4th 859.

- August 11, 2003 letter from the General Manager of the Sonoma County Water Agency to Water Contractors in response to the Friends of the Eel River decision.

- DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center, John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker.

- February 24, 2004 letters from John King, the Brandt Hawley Law Group, and the lawfirm of Weston, Benshoof, Rochefort, Rubalcava & MacCuish to the City of Rohnert Park in opposition to the City's proposed Resolution No. 2004-34.

- March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.

- "Santa Rosa Plain Ground Water Model" – California Department of Water Resources (1987).

- "Meeting Water Demands in Rohnert Park" – California Department of Water Resources, Central District (1979).

- "Geology & Groundwater in the Santa Rosa and Petaluma Valley Areas" – California Department of Water Resources and United States Department of Interior (1958)(G.T. Cardwell).

- "Statement on Groundwater Conditions in Santa Rosa, Petaluma, and Sonoma Valleys, Sonoma County, CA" – United States Department of the Interior – Geological Survey – Groundwater Branch (1955)(AR Leonard and G.T. Cardwell).

- "Groundwater Basins of California, a Report to the Legislature in Response to Water Code Section 12924" (1980).

- "Bulletin No.118 – 4, Volume 1: Geologic & Hydrologic Data 1975; Volume 2: Evaluation of Groundwater Resources Sonoma County, Santa Rosa Plain 1982; Volume 3: Petaluma Valley 1982" – California Department of Water Resources.

- "Groundwater Management in California" – California Department of Water Resources (1999).

- "Bulletin 118 Update" – California Department of Water Resources (2003).

In addition to the wealth of other information that is available for review and consideration by your agency, the information contained in the foregoing documents demonstrates that a sufficient water supply is not available to serve the proposed Casino Project and that the project would cause significant impacts to scarce natural resources in the proposed development area.

Please note that, in addition to a copy of this letter, the O.W.L. Foundation will submit hard copies of the following three items at the March 10, 2004 public scoping meeting to be held in Sonoma County:

(1) 2000 Environmental Impact Report for the City of Rohnert Park General Plan and Urban Growth Boundary ballot measure;

(2) DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center, John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker; and

(3) March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.

Thank you for your review and consideration of these comments and all documents submitted to the record by reference herein.

Very truly yours,

Paeter E. Garcia
WESTON BENSHOOF
ROCHEFORT RUBALCAVA & MacCUISH LLP

EJC/peg
Enclosures: (1)
cc: H.R. Downs, President, O.W.L. Foundation

WATER SUPPLY AND TRANSMISSION SYSTEM PROJECT

ADMINISTRATIVE RECORD
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February 28, 2004

Richard Bloom
Bridget McCoy
755 W. Sierra Avenue
Cotati, CA 94931

Christine Nagel
NEPA Coordinator
National Indian Gaming Commission
1441 L Street NW 9th floor
Washington, DC 20005

Re: 360-acre site outside Rohnert Park's Urban Growth Boundary

Dear Ms. Nagel,

This parcel is currently zoned for agricultural use and is designated a community separator in the Sonoma County General Plan. The county General Plan is, at this very moment, being reviewed and the will of the county appears to be to again endorse the need for open space that originally set these areas aside. The site is bordered to the south by the Laguna de Santa Rosa and contains known wetlands.

Since we live about a mile from this site, we are all too aware and concerned about the impacts that development of this intensity will have on the traffic, groundwater resources and the future land use of the surrounding parcels. We are on a well system and worry that a development of this size could put significant pressure on existing resources.

It seems sensible that any casino development proposed for the Bay Area should be located within an urban growth boundary that currently exists or an area already planned for development.

Sincerely,

Richard Bloom
Bridget McCoy

2004 MAR 16 AM 8:36

Christine Nagle, NEPA Coordinator,
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005
Phone: (202) 632-7003

Date: March 7, 2004

From: Linda M. Long
944 Helene Court
Rohnert Park, CA 94928

Regarding: "DEIS Scoping Comments, Graton Rancheria Casino Project".

Dear Ms. Nagle,

Please address the following comments:

Community Separator

1. This proposal **intrudes into the Community Separator** and Open Space/Agriculture Resource Land use areas of the Sonoma County General Plan, the Rohnert Park General Plan and the Santa Rosa General Plan.

2. This is a **VERY** fragile Community Separator that preserves Agriculture.

3. This is a **VERY** fragile Community Separator that preserves the **visual separation** between the cities of Santa Rosa and Rohnert Park.

4. People who live in Sonoma County know that when they leave their homes they will be in the country within 5 minutes. That is the **character** of our county.

5. Our county is known **nationwide** for it's **successful** efforts in preserving community separators.

6. This proposed project would signal the **beginning of the end** of community separators in Sonoma County.

2004 MAR 19 PM 1:59

Traffic

7. This project would bring 20,000 **additional** cars, buses and service vehicles to the already 'traffic' impacted streets surrounding, and near the proposed project.

8. Stony Point Road is a **heavily traveled** street and is the only alternate route (the 101 freeway alternative) that extends from Petaluma through to the northern part of Santa Rosa. It would be heavily impacted with additional traffic.

9. Tractors travel down Stony Point Rd. Increased traffic caused by this project would hinder farming in the area.

10. The traffic increase from this proposed project on Stony Point Road would **unnecessarily** increase the air pollution causing objectionable odors and health problems to residents in the area.

11. The increased number of service vehicles, cars and buses, 24 hours a day seven days a week, on Stony Point Road would unnecessarily increase **noise pollution** for the people who live in the area.

12. Road surface runoff would be increased due to traffic on Stony Point Road at and near the proposed project site causing **unnecessary** contamination of water in the Laguna de Santa Rosa.

13. The business district in Rohnert Park would be **severely** impacted.

14. The 'site and vicinity' map (figure 2) in the National Indian Gaming Commission packet (7022 Federal Register) at the scoping hearings on March 10, 03 did not accurately depict the vicinity of the proposed project. The only business featured was a drive-in theater that had been **demolished 15-20 years ago.** I'm sending a more comprehensive map in this mailing.

15. Home Depot, Costco, Target and Walmart are anchor stores **within blocks** of this proposed project (see map).

16. These stores are located on the roads going **to/from** the project.

17. There would be 20,000 **extra** cars, buses and service vehicles per day, in our business district, generated from this project.

18. The number of patrons to our already vibrant business district would **slow to a trickle.**

19. The above mentioned anchor stores would **relocate** and the ancillary stores would **close.**

20. I recently saw visuals in a business district where this problem occurred. What resulted was **boarded up buildings, blight and decay.**

21. There would be **gridlock** (traffic) at the entrance to Rancho Verde Mobile Home Park causing noise pollution, air pollution and road surface runoff. This would endanger the health of the people residing in this park. This mobile home park is on Rohnert Park Expressway next to the proposed project.

22. Casinos receive 80% of their patrons from within **50 miles** of their location.

23. Golf Course Drive, in Rohnert Park, is a street that **primarily services the neighborhoods** on either side of this street. With this proposed project buses, cars and service vehicles heading to/from this project from proximate, surrounding areas would heavily impact Golf Course Drive **24 hours a day seven days a week.** 200+ residents live within 18 feet of this street. They would suffer from noise pollution, objectionable odors, road surface runoff, and air pollution due to the increased traffic caused from this project. This would cause unnecessary health problems.

24. Rohnert Park Expressway would be impacted the same as Golf Course Drive.

25. Wilfred Ave. is a **narrow country road** that would lead to the project.

26. **People** live on Wilfred Avenue.

27. Any plans to widen Wilfred are years away.

28. If plans to widen Wilfred are hastened, homes would be demolished and people would **lose their homes sooner than would normally have occurred.**

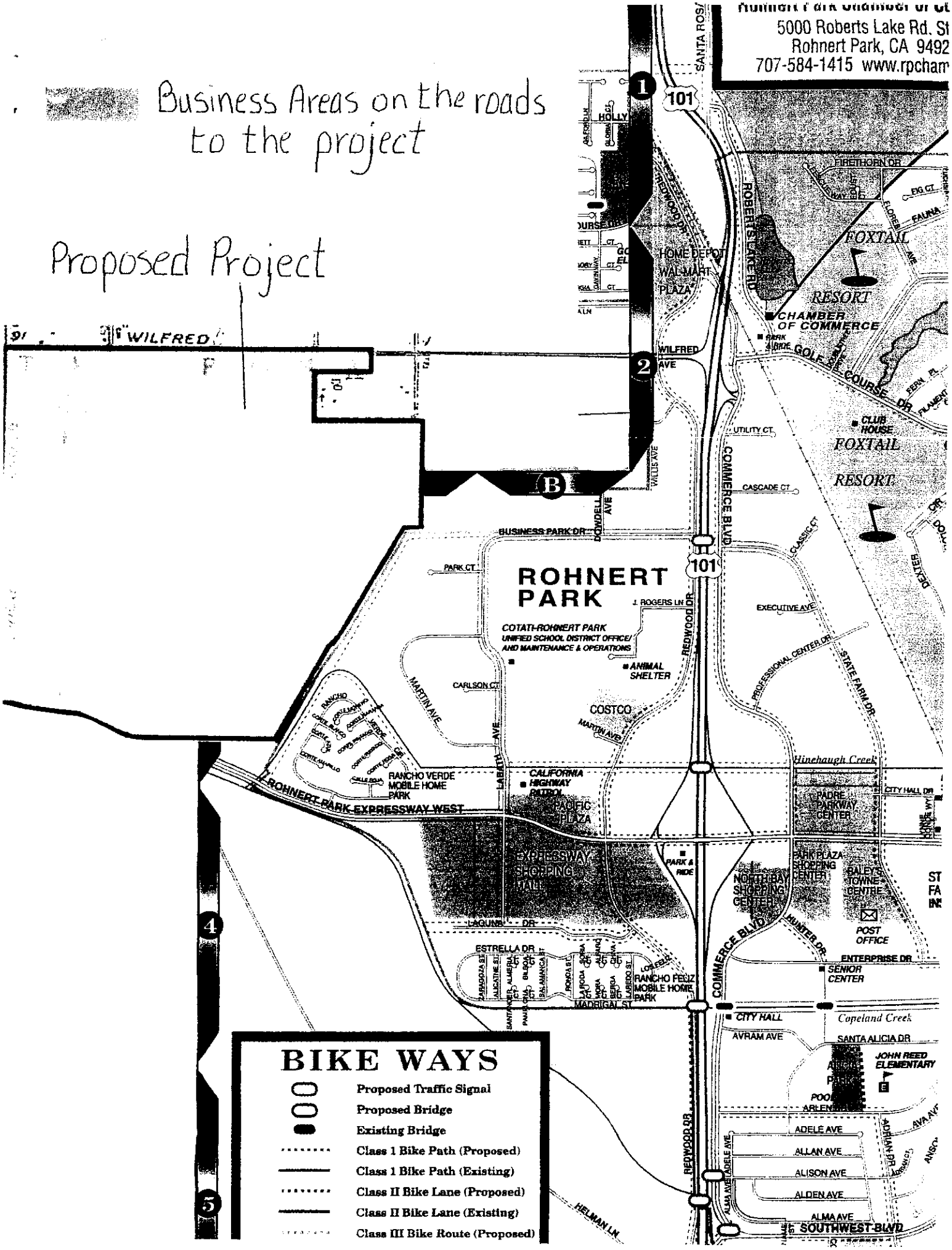
Thank you for addressing these concerns,

Linda M. Long

Linda M. Long

Business Areas on the roads to the project

Proposed Project



928 Langeburg St.
Santa Rosa, CA 95407

11 March 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005

Subject: **DEIS Scoping Comments, Graton Rancheria Casino Project**

Dear Ms. Nagle:

I am concerned that the Graton Rancheria Casino Project will restrict the ability of bicyclists, runners, and walkers (what I'll call "BRW traffic") to use the roads adjacent to the new facility. I understand that the casino will occupy a large portion of land east of Stony Point Road. Stony Point Road is currently the only north-south route with shoulders that are wide enough to accommodate BRW traffic. I would like to request that any plans to accommodate the increased traffic associated with the casino also take into account the needs of bikers, walkers, and runners. I currently depend on the wide shoulders of Stony Point Road to convey my bicycle and me to work every day. I do not want the casino to take away a transportation option that is critical in reducing our nation's dependence on fossil fuels.

I am also very concerned about drainage and flooding in the area of the proposed casino. Several times a year the Rohnert Park Expressway is closed because of flooding. If the casino exacerbates flooding on the RP Expressway or Stony Point Road, it will restrict the public's ability to commute and recreate via two-wheeled, human-powered vehicles.

Thank you for hearing my concerns.

Sincerely yours,

Peter W. Seaman

2004 MAR 19 PM 1:50

March 14, 2004

Ramona Mooney
1841 Salem Ave. #9
Santa Rosa, CA 95401

Christine Nagel
NEPA Coordinator
National Indian Gaming Commission
1441 L St. NW, 9th Floor
Washington, DC 20005

Dear Ms. Nagel,

Frankly, I do not think the proposed location for the Graton Rancheria casino, outside Rohnert Park, is a good idea. I don't like casinos or gambling and would like to preserve what is left of our beautiful countryside. I hope the Indians can find a better way to raise money. If they have to have a casino, they should put it somewhere like Santa Rosa Avenue, which is already developed.

Thank you for your attention to this matter,

Sincerely,

Ramona Mooney

Christine Nagel
NEPA Coordinator
National Indian Gaming Commission
1441 L street, 9th Floor
Washington, DC, 20005

DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagel, March 15, 2004

My concerns regarding the proposed Indian Gaming Casino adjacent to Rohnert Park, are in three categories; Environmental, Economic and Social.

Environmental impacts of concern include those to the air, water, waste water, solid waste, noise and traffic. Economic impacts include the effect of the proposed casino to surrounding businesses and the local job market, and the future dislocation to the city and school budgets when the Memorandum of Understanding, MOU, drafted between the casino and city, expires in ten years. Social impacts include increased crime, dislocation of families with access to local, easily available gambling, decline on moral values of the surrounding community and the effect of this on schools, which will derive a portion of their funding from gambling.

The MOU signed jointly by the Federated Indians of the Graton Rancheria and the Rohnert Park City Council, which can be terminated arbitrarily at any time by the Tribe, provides the promise of money as an attempt to mitigate only some of the impacts. I am concerned with many of the impacts that cannot be mitigated simply with money, and the adequacy of the amount of money proposed as mitigation of those few impacts addressed. There has been no provision made to deal with those impacts that have not been addressed, or any impacts, should the MOU be terminated.

The economic life of a typical casino is estimated at ten years. There is no attempt to address those mitigations that will remain in this community after the casino either closes or is expanded as its economic life ends, either of which will stop the money proposed to deal with those impacts.

Additionally, as the recall of several of the Rohnert Park City Council members proceeds, it will become apparent that the current city council does not reflect the views of the voters they are remiss in representing. This will be reflected in the position future city councils may take regarding the proposed casino as well as the MOU.

Sincerely,

Larry Resnick

Larry Resnick
7956 Becky Court,
Rohnert Park, CA 94928

2004 MAR 19 PM 1:55

March 17, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW. 9th Floor,
Washington DC 20005

Re: **DEIS SCOPING COMMENTS, GRATON RANCHERIA PROJECT**

Dear Ms. Nagle:

I believe the proposed casino site in Rohnert Park will have adverse impact on the surrounding community and environment for numerous reasons. I have listed the reasons below and request replies to each of my listed concerns.

Environmental Issues:

1: The site of the proposed casino is migratory wetlands and will encroach on the resting/feeding area of the pacific flyway.

2: The site of the proposed casino is also the location of several vernal pools.

3: The proposed site is in the middle of a floodplain.

4: The proposed site sits directly astride the Laguna de Santa Rosa water system.

5: The proposed site is on an aquifer that is currently losing 4.3 million gallons a day as per the O.W.L.Foundation research. This proposed casino/resort threatens to further deplete and cause massive water shortages in the surrounding area.

6: The proposed site is the habitat of the tiger salamander and several other endangered animals and plants.

7: The proposed site was identified in September of 1999 by the Department of the Army Corps of Engineers as a Hazardous, Toxic, Radioactive Waste Site and Ordinance and Explosive Waste Site DERP/FUDS Site No J09CA747000. This requires a Phase I investigation by the EPA.

Community Issues:

1: The Casino is to be a Resort Destination establishment and will therefore diminish local motel and restaurant business revenue, possibly causing business closure and subsequent layoffs.

2004 MAR 23 PM 1:38

2: The Casino will not contribute to the tax base although causing numerous additional costs to the surrounding community.

3: The Casino will require additional low income housing for the lower scale employees of the casino that will not be bound by California employment or safety laws.

4: The Casino will impact the public hospitals caring for the lower end casino employees requiring medical attention.

5: The Casino will impact the amount of traffic congestion in the surrounding area already at a crisis level. The increase in traffic will also cause our already deteriorating roadways to fail more frequently and require more maintenance and upgrading.

6: The Casino will cause an increase in crime as indicated by increases of up to 84 percent in one community.

7 Since the Casino will be serving alcohol it will increase the amount of drunk drivers on the surrounding roads.

8 The Casino is located within one mile of nine schools and preschools. It is within two miles of twenty schools and preschools. It is within three miles of thirty schools including a university, two high schools, one continuation school, three Junior High/middle schools, elementary and preschools.

9: The casino site is adjacent to Rancho Grande Mobile Home Park with over 750 residents including children.

10: The casino is in close proximity to Rancho Feliz Mobile Home Park with over 500 residents including numerous small children.

11: The Casino is in violation of the Sonoma County General Plan as the site is designated as Open Space/Community Separator for agricultural use only.

12: The proposed Casino is to be constructed on a site that is an Open Space/ Green belt Space that can **never** be mitigated once destroyed.

13: The proposed Casino is to be constructed on a Community Separator which can **never** be mitigated once constructed

Alternative Uses:

1: Continued use as designated in Sonoma County General Plan as Open Space/ Community Separator.

Alternative Sites:

1: The initial proposed site on Highway 37/Lakeville is sufficiently distant from residential and community locations as to minimize the impact. The Highway 37/Lakeville site has highway access from the north and south as well as east and west. The Highway 37/Lakeville site also with a small amount of dredging could allow ferry boat access at Point Sonoma from nearby bay area communities. This more central location and increase in accessibility will increase the profits realized by the proposed casino.

2: The former naval facility located at Skaggs Island is surplus land. It is in close proximity to the initial proposed Highway 37/Lakeville site. It also is sufficiently distant from both residential and community locations as to minimize the impact with less environmental impact. It is a several hundred acre site with water, sewage and additional infrastructure already in place. The site is also accessible from Highway 37 and is approximately halfway between Highway 101 and Highway 80. These are both major thoroughfares and would allow access as the initial Highway 37/Lakeville site.

3: The former Hamilton Air Force Base already is centrally located with direct freeway access from Highway 101 with minimal impact on surrounding surface streets. It is a several thousand acre developed area with water, sewage and additional infrastructure already in place. This more central location and better accessibility will increase the profits realized by the proposed casino.

4: The former Mare Island Naval Ship Yard although not in Sonoma or Marin County is another large facility with both highway and water access. It too has an already existing infrastructure with water and sewage. It is an existing commercial area that needs and demands development.

Please consider my concerns and the concerns of the other many local residents while evaluating this title transfer and project request.

Sincerely,

Steve Bosshard
5769 Dexter Circle
Rohnert Park, Ca 94928
(707) 480-9495

cc: Gov. A. Schwarzenegger/ Mr. Peter Siggins
Senator D. Feinstein
U.S. Rep. L. Woolsey
Senator D.Inoye
Senator R. Campbell

DEIS SCOPING COMMENTS – GRATON RANCHERIA

March 10, 2004
979 Golf Course Drive
400
Rohnert Park, CA 94928

Chairman
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington D. C. 20005

The proposed location of Graton Rancheria Gambling Resort in Sonoma County next to the City of Rohnert Park will have significant environmental impacts on the community and all of its citizens. The environmental challenges are far beyond the remedies and resources of Nevada's Station Casinos Gambling Group or any other mitigation.

The proposed gambling casino is in the middle of a wetlands area, a flood plain and a well-documented aquifer that provides drinking and other water resources to the residents and businesses of Sonoma County.

The proposed gambling casino is also in the middle of a five-city area and is surrounded within a three-mile radius by 22 schools, ranging from pres-schools to high schools, and Sonoma State University. The socio-economic environmental impacts -crime, traffic, and overload of public safety operations- on the surrounding communities are significant and sobering. These impacts will continue to develop and affect the surrounding communities long after any compact or mitigation remedies.

The proposed gambling casino will adversely impact already constrained water resources, degrade water quality, nullify local and county land use plans, increase noise, light and air pollution, and endanger sensitive ecologies in a floodplain/wetland area.

The city of Rohnert Park is already the subject of a local lawsuit concerning its responsibilities under the California Environmental Quality Act (CEQA) in regard to the proposed gambling casino development.

It is clear that the majority of the citizens in the area surrounding the proposed gambling casino are opposed to it and to any other site in this area.

We recommend that the Commission seriously consider an alternative Sonoma-Marin County site for any proposed gambling casino that meets the following criteria:

-Not in an environmentally sensitive area such as the current site.

-Not in the middle of a multi-city residential/family-oriented area.

-Be situated where any casino/gambling related socio-economic factors (e.g., increased crime) will not impact existing communities.

Alternate sites include the Sears Point corridor where Stations Casinos currently retains an interest in over 300 acres of land, a rural, sparsely populated area along the Marin/Sonoma county boundary line, or some development on the edge of the bay.

We are dedicated to pursuing an alternative site for any casino that will not create sub-standard living and working conditions for anyone!

Chairperson
Stop the Casino 101.com

Vice Chairperson
Citizens Against the Casino

Chairperson
Action Against the Casino

Chairperson
The Southwest Alliance

Chairperson
Democracy for Rohnert Park

CF: Honorable Diane Feinstein
Honorable Lynn Woolsey
Secretary of the Interior
Secretary of the Bureau of Indian Affairs
Supervisor Tim Smith, Sonoma County

3-10-04

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MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Please Kind Sirs,

take note of the Flood Plain area That is proposed for a casino. TAKE note of the wildlife, some of which are endangered. this could be the end for them without a doubt.

take note of the terrible impact of the Traffic, a major Highway will come to a complete stop, not to mention the clogged streets in our community. Travel will STOP. Crime will flourish

Many in our community and surrounding areas depend upon ground water, well water. They will Have NO WATER. They cannot afford to drill down one Thousand feet to get a drink of Water.

When the water is gone,
What then. The earth settles.
Serious problems with buildings
and streets will occur.

Please Consider
The enviroment!
We don't get a second chance.

Thank You,

Dana and Jerry
Segura
6184 San Ramon pl.
Rohnert Park 94928

3/10/04

DEIS Scoping Comments/Graton Rancheria Casino Project

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L St., NW, 9th Floor
Washington, D.C., 2005

Dear Ms. Nagle,

As resident of Rohnert Park, I wish to voice my complete opposition regarding the proposed location of 450 acre casino adjacent to Rohnert Park. The recipe the Graton Rancheria landless tribe is following is similar to that of the Connecticut Pequot tribe. This tribe started out with some 300 acres, but as their membership jumped, they discovered they needed to annex another 2000 acres according to the book; "Hitting the Jackpot's" author Brett Fromson.

We have been informed that the Graton Rancheria tribe actually existed in Graton, and that there is still tribal land there today. However, with the Graton tribe reportedly growing from just 3 members to suddenly 555 a few months ago, and is now at 999, I am afraid the area being proposed (see attached map) is most certainly woefully inadequate. The casino alone proposes to use 450 acres, and Federated Indians of Graton Rancheria tribe appears to double every few months, so where will the land expansion occur? The proposed site in bounded within a tiny city separator. If the same recipe is followed, the land encircled with green (see map) will be the minimum square footage necessary to support the casino and the current tribal population. As you can see, entire existing neighborhoods, farms, and most of the major tributaries of the main regional water supply water already in existence will have to be wiped out. This is unacceptable.

The blue lines on the attached map show our regional main water source. Recent water reports indicate that:

1. Sonoma County has county wide water scarcity issues.
2. We have a critically overdrafted groundwater basin.
3. The proposed site has a current Williamson Act designation.
4. Endangered species : T. Ameonum, B. Bakeri, L. Vinculans, A. Californise, L. Burkei, and the Tiger Salamander are found at this site.

Any construction at this site or waste dumping would endanger both human life and already endangered plant and animal life. We cannot afford to give up what little water we have (Rohnert Park residents are currently on metered water due to water shortages), to provide land that has been zoned agricultural to preserve this precious commodity. Additionally, with the growth of the tribe, a much land larger area is already necessary for their population accommodation, as well as their future growth.

Additionally, our tiny roads and overcrowded two lane freeway cannot handle 20,000 extra cars per day. I believe that this location will be environmental disaster for the citizens of Rohnert Park, and adjoining cities, the federated Indians of Graton Rancheria, and local endangered plants and animals. To lose all of our water and then have clogged smoggy roadways isn't going to be good for any human, plant or animal. These issues simply cannot and will not be "mitigated" by FIGR, Stations Casinos, NEPA, or any other group. It is just the wrong location, and was inadequate for the tribe from the very beginning and is more inadequate now, with their soaring membership.

I respectfully submit to the NIGC and the BIA that the NEPA review will clearly exclude this site from being considered for the aforementioned reasons. I would request that the important, critical, and pressing issues in this letter each be addressed in your response.

Best Regards,

Lynne Condé, R.N.
5732 Dexter Circle
Rohnert Park, California
94928

Cc: CAC, AAC, Gov. Schwarzenegger, Pres. Bush

RECEIVED

MAR 10 2004

National Indian Gaming Commission
Region II, Sacramento, CA

Please consider any action you can take to stop the casino.

Consider the following reasons which will have serious, irreversable effects on our community and environment:

Traffic will be a disaster: Highway 101 is already filled to capacity. Virtually everyone who drives in Sonoma County does their best to avoid 101 as much as possible, particularly after 2 PM. This casino is expected to bring 10,000 to 20,000 more cars on 101 during the weekends. This could make 101 virtually undrivable. What will the effect be on our air quality if cars on 101 slow to 25 mph from Rohnert Park down to Petaluma?

Crime will most certainly go up, including possible drug trafficing and drunk driving accidents. This is something Sonoma County can do without. We already have a growing gang problem; what will a casino bring to this already growing mess?

Rohnert Park is running out of water: The casino promoters claim that they will provide money to mitigate problems this project will bring. The money they offer can help us with some issues, but it can't make water appear out of nowhere. We are struggling to provide water in our city as well as to the surrounding areas. Penngrove has been hit especially hard. What will happen to the city if this monstrous facility is built? Money can't buy water that doesn't exist.

Thank you for your time
Chris Worthington
Rohnert Park, CA

697

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MAR 10 2004

National Indian Gaming Commission
Region II, Sacramento, CA

THE FIRST AND MOST IMPORTANT
OUR WATER TABLE, THE COUNCIL PUT IN METERS
TO EFFECT A LESSER USAGE, AND THEN THEY
TURN AROUND AND OK A CASINO DEAL THAT
WITH 2 1,000 WELLS WILL DEFINATELY ADVERSLY
AFFECT US, FOR A LONG TIME.

THE SECOND PROBLEM IS THE TRAFFIC
IS ALREADY TAKES MY 120 TO DO A JOURNEY
THAN WITH CLEAR TRAFFIC TAKES 34 MINUTES
YOU WILL TURN 101 INTO A PARKING LOT AT
TIMES WHICH AGAIN WILL NOT DO ANY OF
OUR CITIZENS ANY GOOD.

I TRULY BELIEVE THAT THE THIRD ITEM
WILL BE CRIME, ACCORDING TO STATISTISS
WILL INCREASE 84%, WE ARE ALREADY
EXPERIENCING SOME VERY BAD CRIME AREAS
IN SONOMA COUNTY

I COULD GO ON BUT LASTLY
WOULD LIKE TO SAY, WE JUST PLAIN
DON'T WANT IT, IF IT WERE PUT TO A VOTE
IT WOULD NOT PASS, AND OUR COUNCIL
FOUR MEMBERS ARE TRYING TO PUSH IT
DOWN OUR THROATS

ALBERT E. DAWSON
342, ALISON AVE,
ROHNERT PARK
CA 94928.

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Greenbelt Alliance
PROTECTING OPEN SPACE AND PROMOTING LIVABLE COMMUNITIES

March 9, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street NW, 9th Floor
Washington D.C. 20005

Re: DEIS Scoping Comments – Graton Rancheria Casino Project

Dear Ms. Nagle,

Thank you for the opportunity to comment on the Graton Rancheria Casino Project's DEIS scoping process.

Greenbelt Alliance is the Bay Area's leading land conservation and urban planning non-profit. Founded in 1958, Greenbelt Alliance is dedicated to protecting the region's open space and making Bay Area communities better places to live. Over the years, Greenbelt has helped to save more than 1,000,000 acres of Greenbelt lands and helped generated over $500 million to acquire new parklands and other open space.

Greenbelt Alliance first became concerned with this project when the Federated Indians of the Graton Rancheria proposed a casino development on 2,000 acres of highly scenic and environmentally sensitive open space fronting the San Pablo Bay in southern Sonoma County. Greenbelt Alliance joined a long list of jurisdictions, elected officials, environmentalists, and county residents in opposition to development of any kind on the 2000-acre bay front site. After significant opposition, Station Casinos and the Graton Rancheria withdrew their proposal for the bay front site and selected the current 360-acre site just outside the northwest corner of Rohnert Park's urban growth boundary for their proposed casino development.

Given Greenbelt Alliance's longstanding position that new development should occur inside established urban growth boundaries, we believe the site near Rohnert Park -- outside the UGB -- proposed for the Indian Gaming facility is inappropriate for any development. Any casino development proposed for the Bay Area should comply with local land use regulations and be located within an urban growth boundary or an area already planned for development.

MAIN OFFICE ◆ 631 Howard Street, Suite 510, San Francisco, CA 94105 ◆ (415) 543-6771 ◆ Fax (415) 543-6781
SOLANO/NAPA OFFICE ◆ 725 Texas Street, Fairfield, CA 94533 ◆ (707) 427-2308 ◆ Fax (707) 427-2315
SOUTH BAY OFFICE ◆ 1922 The Alameda, Suite 213, San Jose, CA 95126 ◆ (408) 983-0856 ◆ Fax (408) 983-1001
EAST BAY OFFICE ◆ 1601 North Main Street, Suite 105, Walnut Creek, CA 94596 ◆ (925) 932-7776 ◆ Fax (925) 932-1970
SONOMA/MARIN OFFICE ◆ 50 Santa Rosa Avenue, Suite 307, Santa Rosa, CA 95404 ◆ (707) 575-3661 ◆ Fax (707) 575-4275
info@greenbelt.org ◆ www.greenbelt.org

Greenbelt Alliance

PROTECTING OPEN SPACE AND PROMOTING LIVABLE COMMUNITIES

If an Indian Gaming facility is considered for approval anywhere in the Bay Area, a full environmental review process should be undertaken consistent with CEQA and NEPA. Particular attention should be paid to protecting endangered species, wetlands, water supply and wastewater disposal issues, and air quality. In addition, the development proposed should be required to adhere to good planning and design principles, including:

- The housing demand created by the development, and provision of affordable housing;
- Transportation alternatives to reduce auto dependency and traffic impact;
- Providing for Mixed-use development opportunities as is feasible;
- Compact site design;
- Site design to protect and respect adjacent agricultural uses;
- Green building standards and energy efficient design.

Greenbelt Alliance appreciates the opportunity to comment on the scope of this DEIS and looks forward to the questions we have raised in this letter being addressed during the environmental review process. Please do not hesitate to contact me if you have any further questions regarding our concerns.

Sincerely,

Kelly

Kelly Brown
Sonoma/ Marin Field Representative

MAIN OFFICE ◆ 631 Howard Street, Suite 510, San Francisco, CA 94105 ◆ (415) 543-6771 ◆ Fax (415) 543-6781
SOLANO/NAPA OFFICE ◆ 725 Texas Street, Fairfield, CA 94533 ◆ (707) 427-2308 ◆ Fax (707) 427-2315
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SONOMA/MARIN OFFICE ◆ 50 Santa Rosa Avenue, Suite 307, Santa Rosa, CA 95404 ◆ (707) 575-3661 ◆ Fax (707) 575-4275
info@greenbelt.org ◆ www.greenbelt.org

CHRISTINE NAGLE, NEPA COORDINATOR
NATIONAL INDIAN GAMING COMMISSION
1441 L STREET, NW., 9TH FLOOR
WASHINGTON, DC 20005
202-632-7003

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Date: 3/10/04

From: Carolyn Pimentel
3647 Melcon Lane
Santa Rosa, Ca 95407

Subject: Graton Rancheria Rohnert Park Site
DEIS Scoping Comments, Graton Rancheria Casino Project

Outline Questions and Concerns:

LAND USE: According to the Sonoma County General Plan, this land is a designated as a Community Separator and zoned agricultural it is also listed part of the California Land Conservation Act (LCA) of 1965 known as the Williamson Act:

- Will this remain a community separator never intended to be developed?
- Will this land or land around it be conversed into urban development when it is considered within the spheres of influence?
- What will be the design to protect agriculture and minimize conflicts with adjacent agricultural uses?
- What buffer will be formed as a setback to create sufficient distance to avoid land use conflicts between the agricultural uses and the non-agricultural uses?

OPEN SPACE: Open space and greenbelt

- What will establish and maintain interconnected greenbelts and open spaces for the protection of native vegetation and wildlife including for the enjoyment of the community?
- What plan will be established to require and designate wildlife or fragile ecological nature?
- What practices are going to be done to promote wise, efficient and environmentally sensitive use of this land?

VISUAL

- What protection is there going to be for scenic resources?
- What practices are going to be taken to nullify or minimize land alterations?
- What practices are going to be done with concerns of lights and surrounding communities and neighbors?
- What buffers may be created to limit impacts associated with noise and the potential release of hazardous materials?
- If buffers are created, what design will be done to minimize visual impacts?

TRAFFIC:

- What type of through-traffic shall be accommodated in the manner that discourages the use of neighborhood roadways, particularly local streets?
- What will be created to offset the "heavy fog" significantly noted in this area and areas around that maybe used as a through way?
- What would be the Congestion Management Program?

WATER USE (wells proposed):

- What plan will be formed to promote efficient water use and reduce water demand?
- What shall protect the watersheds of all bodies of water associated with proposed wells?

- What will be done if neighboring residents or farms lose their wells, or wells drop levels due to heavy well consumption used by proposed wells?

SEWAGE COLLECTION:

- What plan will be formulated to ensure neighbors and existing water channels are not contaminated during collection and treatment of sewage?
- What treatments will be implemented to treat such sewage?
- How and where is the treated water going to be disbursed?
- What are the procedures to disburse treated sewage?

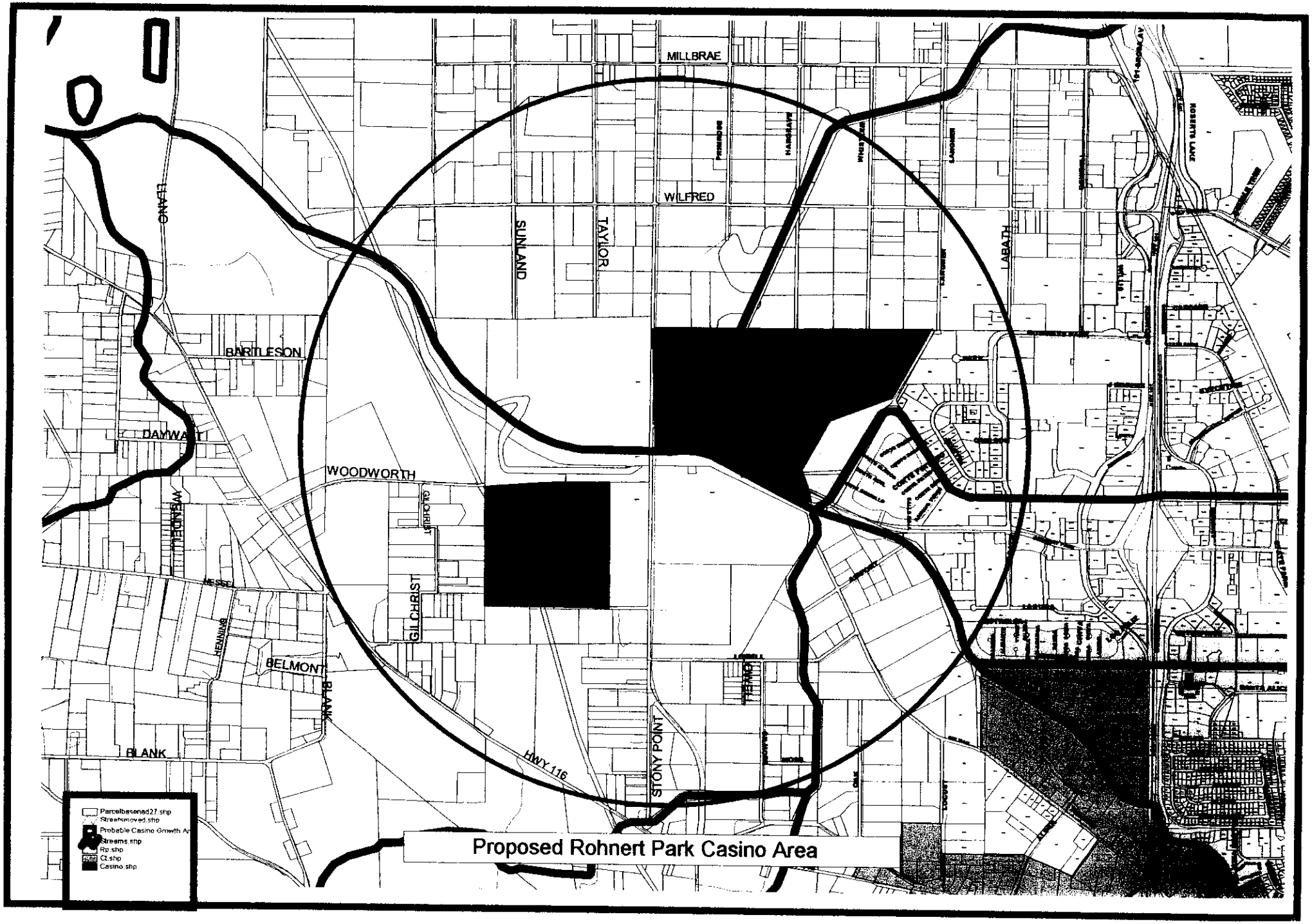
STORM WATER:

- According to the FEMA map this land is listed in the flood zone. What is going to be done to eliminate this land from the FEMA map?
- How is the water going to be collected and more importantly WHERE IS the water going to be disposed?
- Are neighboring farmlands, residences, and roadways going to flood more? Where there was no flooding is this going to create flooding?
- What is the procedure going to be if more flooding is going to be created?
- What assurances are there going to be that neighbors, neighboring farms and surrounding roadways are not going to increase in flooding?
- How is storm water going to be collected and what is the manner that least inconveniences the public, reduces potential water related damage and enhances the environment?
- How is the natural storm water drainage system going to be preserved and what is going to be done to enhance natural features?
- How is the storm water going to replenish local groundwater supplies?
- How are the natural wetlands going to be preserved?
- What ground water is going to replenish water basins to irrigate agricultural lands and wells surrounding the area?

Thank you for your concerns and answers to the above questions.

Sincerely,

Carolyn Pimentel


MILLBRAE
WILFRED
SUNLAND
TAYLOR
LABATH
ROBERTS LAKE
BARTLESON
DAMWATT
WOODWORTH
GILCHRIST
WENDELL
HESSEL
HENNING
BELMONT
BLANK
STONY POINT
HWY 116
Parcelbasenad27.shp
Streetsmoved.shp
Probable Casino Growth Ar
Streams.shp
Rp.shp
Ct.shp
Casino.shp
Proposed Rohnert Park Casino Area

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

March 10, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W.
9th Floor
Washington,
DC 20005

Dear Ms. Nagle;

Thank you for your attention to our previous communication, including the O.W.L. Foundation's policy statement regarding a proposed Indian gaming casino on land already demonstrated to be in groundwater overdraft. We strongly urge you to deny any such request because a water consumer of this magnitude would further exacerbate Sonoma County's dwindling water supplies. Furthermore, establishing a federal water right directly on top of a groundwater overdraft area automatically would create an inherently unstable legal climate. In fact, a host of reasons argue against this particular location as a suitable casino site; our legal arm is submitting an expanded list of these reasons to you.

In May 2003 the United States Department of the Interior (DOI) issued a dire warning to all residents of the American West regarding immanent drought and the likelihood of potential conflicts arising from drought. The DOI specifically singled out an area of northern California that includes all of Sonoma County as having a "substantial conflict potential".

As early as 1972, the United States Geological Survey (USGS) mapped "water adequacy yields" in Sonoma County. The USGS determined that groundwater yields for Rohnert Park were "inadequate for heavy industry, irrigation and municipal [use]". Despite this warning, groundwater pumping continued and levels plummeted by as much as 150 feet.

In 1987 the Department of Water Resources (DWR) identified a huge "cone of depression" centered on Rohnert Park. A cone of depression of this size indicates massive pumping with no regard for the need to replenish groundwater levels through natural recharge. Almost no remedial efforts have been mounted to alleviate negative draft. Unfortunately, surface water is no longer an option to balance this over drafted water budget.

A recent legal decision has put into motion the eventual restriction of Eel River waters that usually swell the capacity of the Russian River. The Russian River is the single greatest source of surface water and also of groundwater, through natural recharge, in Sonoma County. These looming restrictions of Eel River waters mean less surface water availability for water contractors who are serviced by the Sonoma County Water Agency (SCWA) aqueduct. With limits being reached on groundwater availability and now with limits being imposed on surface water availability, there will be no way to make up any deficiencies (and that includes the inevitable naturally occurring droughts).

P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

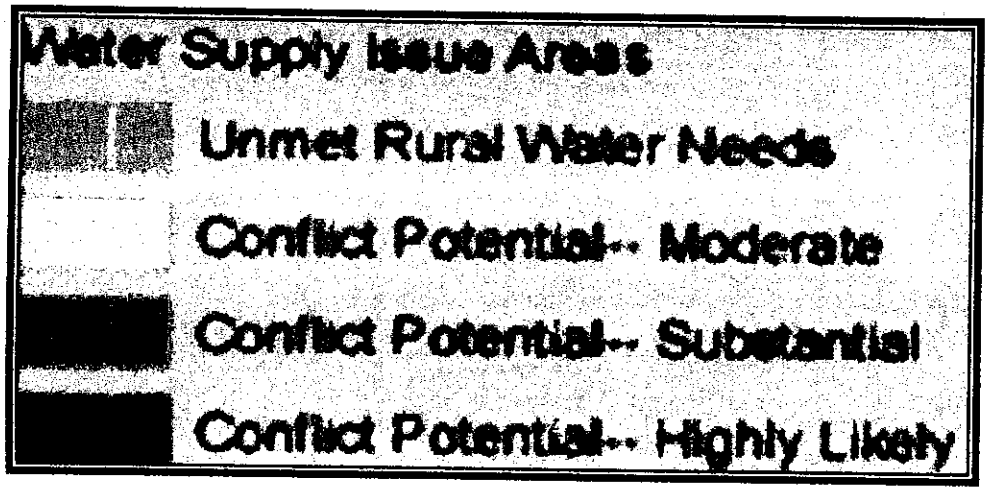
The American West is facing a serious crisis. In the long run, we will not have enough water to meet the fast-growing needs of city residents, farmers, ranchers, Native Americans, and wildlife. The demand is increasing; the supply is not. It is time for Americans to become proactive in our efforts to resolve the problem. Crisis management is not a long-term solution.

- U.S Dept of Interior, 2003

Potential Water Supply Crises by 2025

- U.S. Dept. of Interior, May 2003

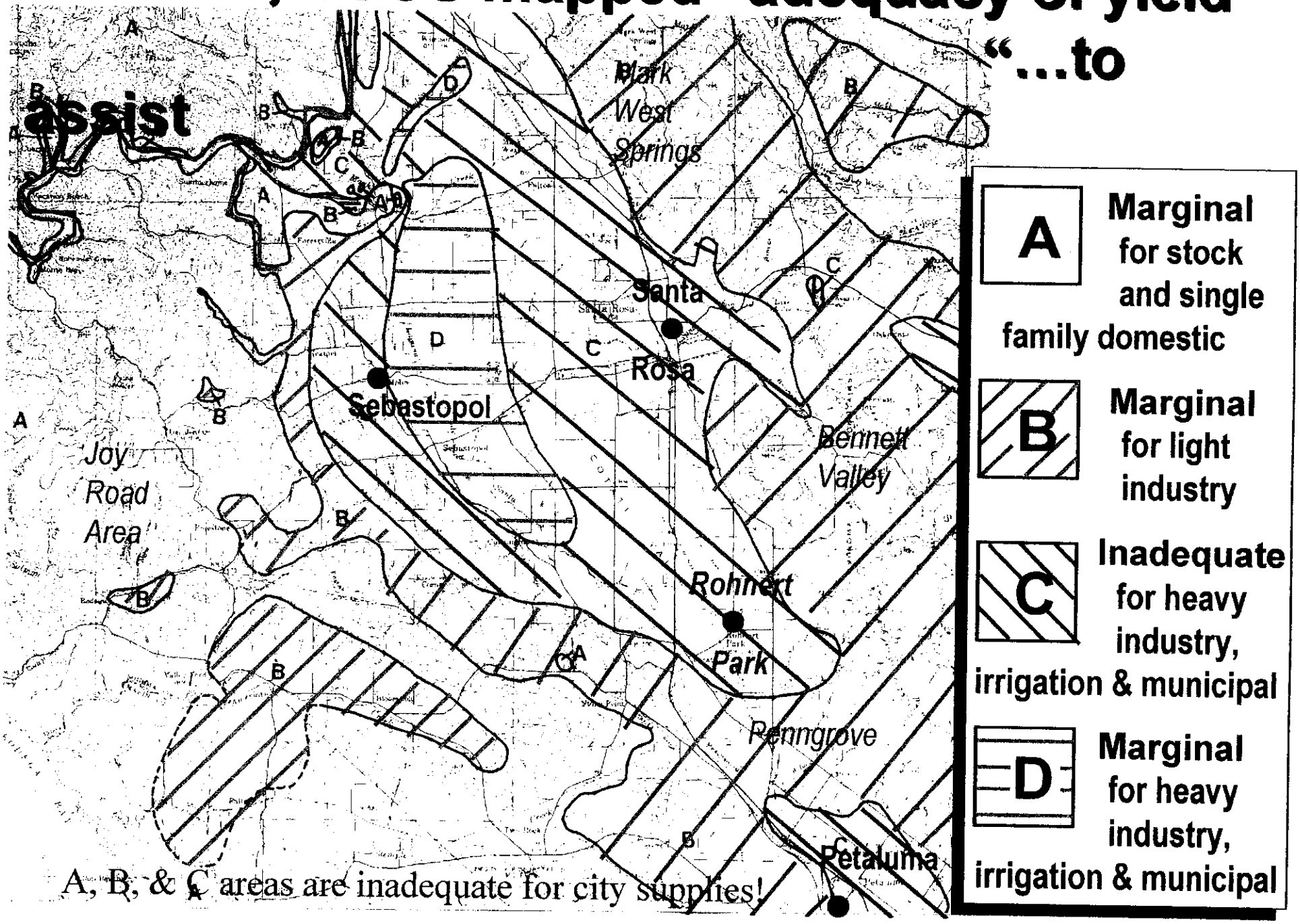
(Areas where existing supplies are not adequate to meet water demands for people, for farms, and for the environment)



Sonoma & Marin's water supply "*Conflict Potential*" compares to L.A. & Klamath Basin.

"*Conflict Potential*" in Sonoma & Marin is "*Substantial*"

In 1972, USGS mapped "adequacy of yield" "...to assist



A, B, & C areas are inadequate for city supplies!

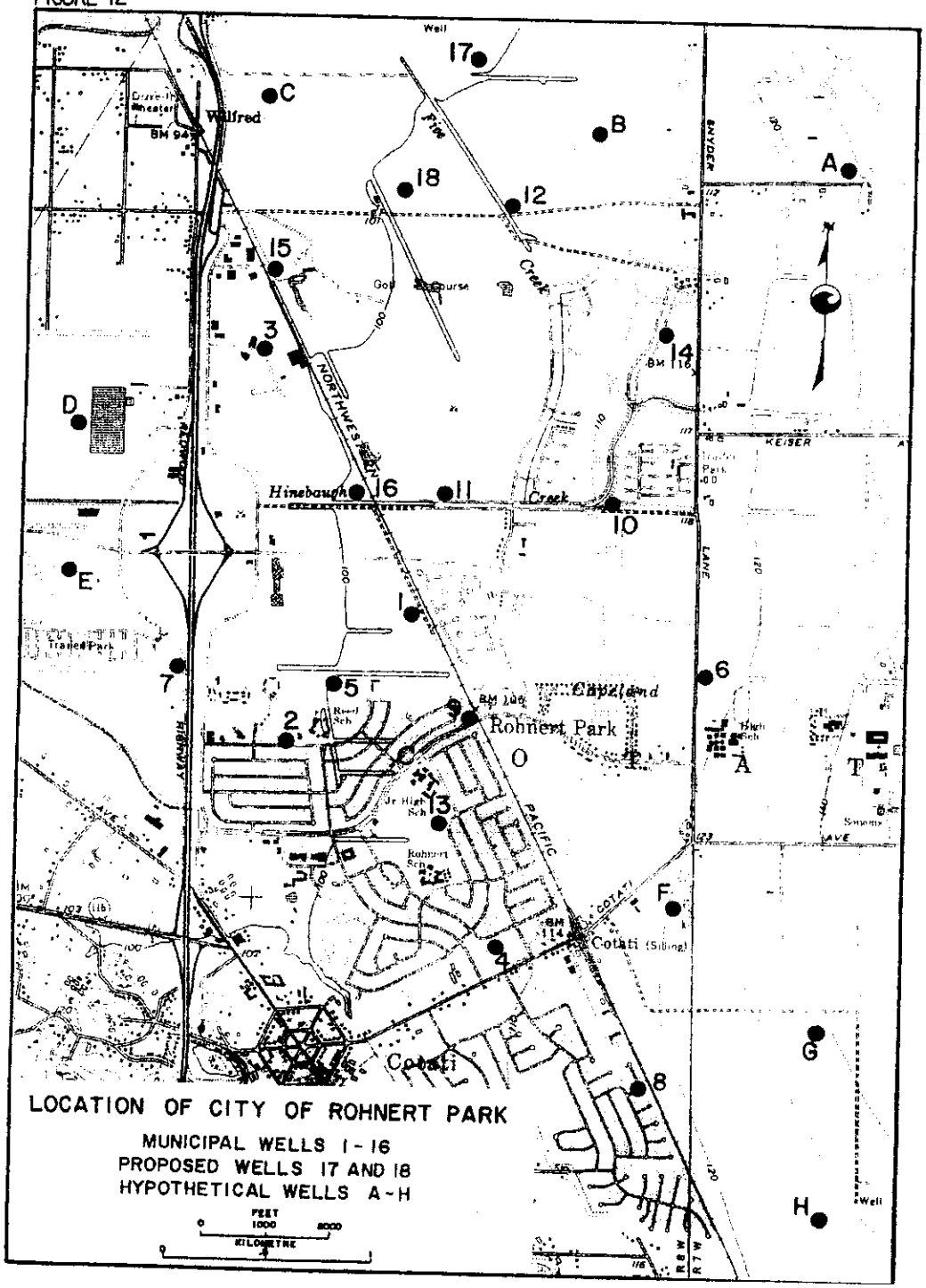
In 1979, 16 wells supplied water to Rohnert Park.

Today, Rohnert Park has 42 municipal wells, 31 of which are active.

Rohnert Park is also increasingly reliant on SCWA allocations.

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

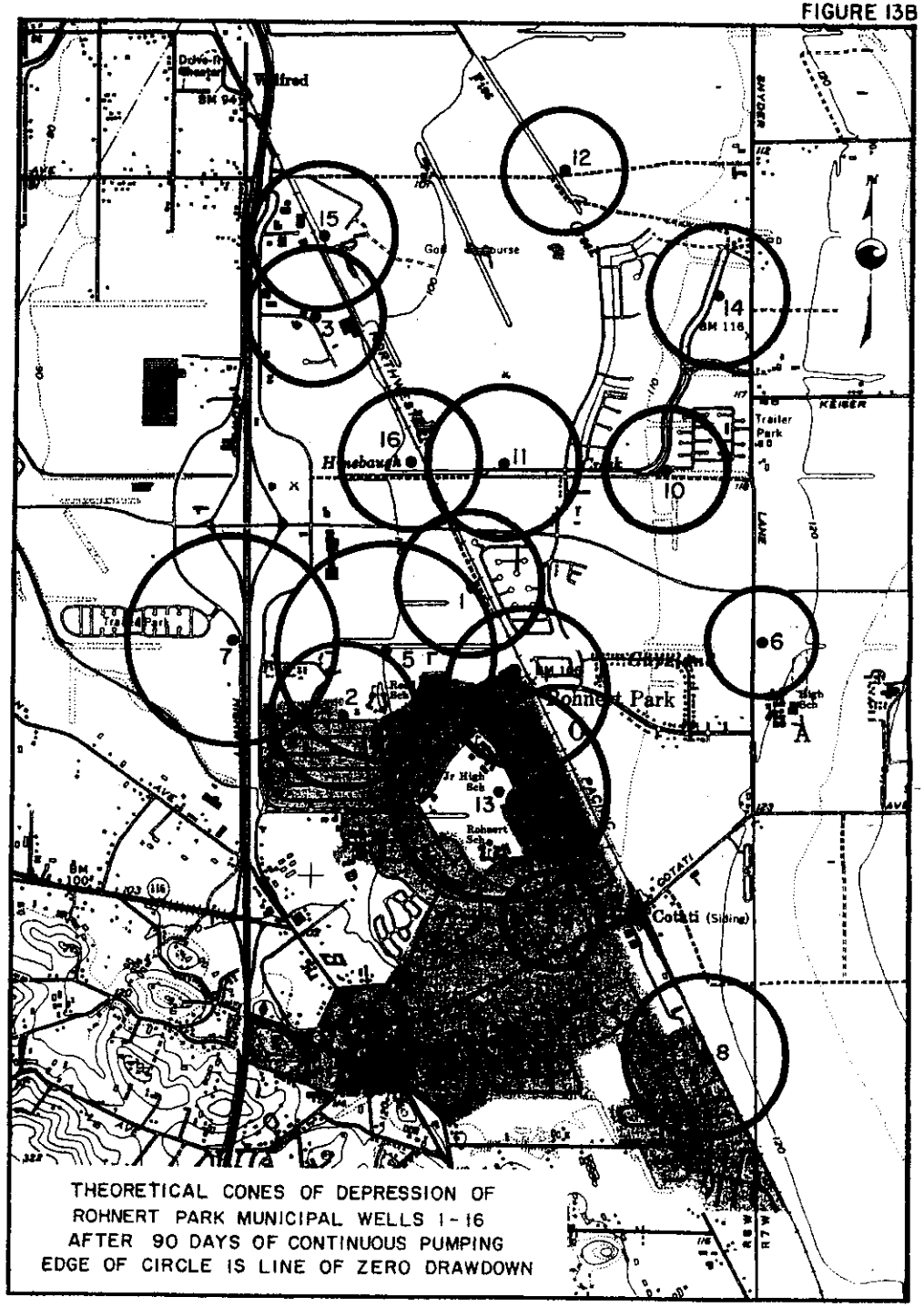
FIGURE 12



Cones of depression for 16 Rohnert Park municipal wells.

90 Days

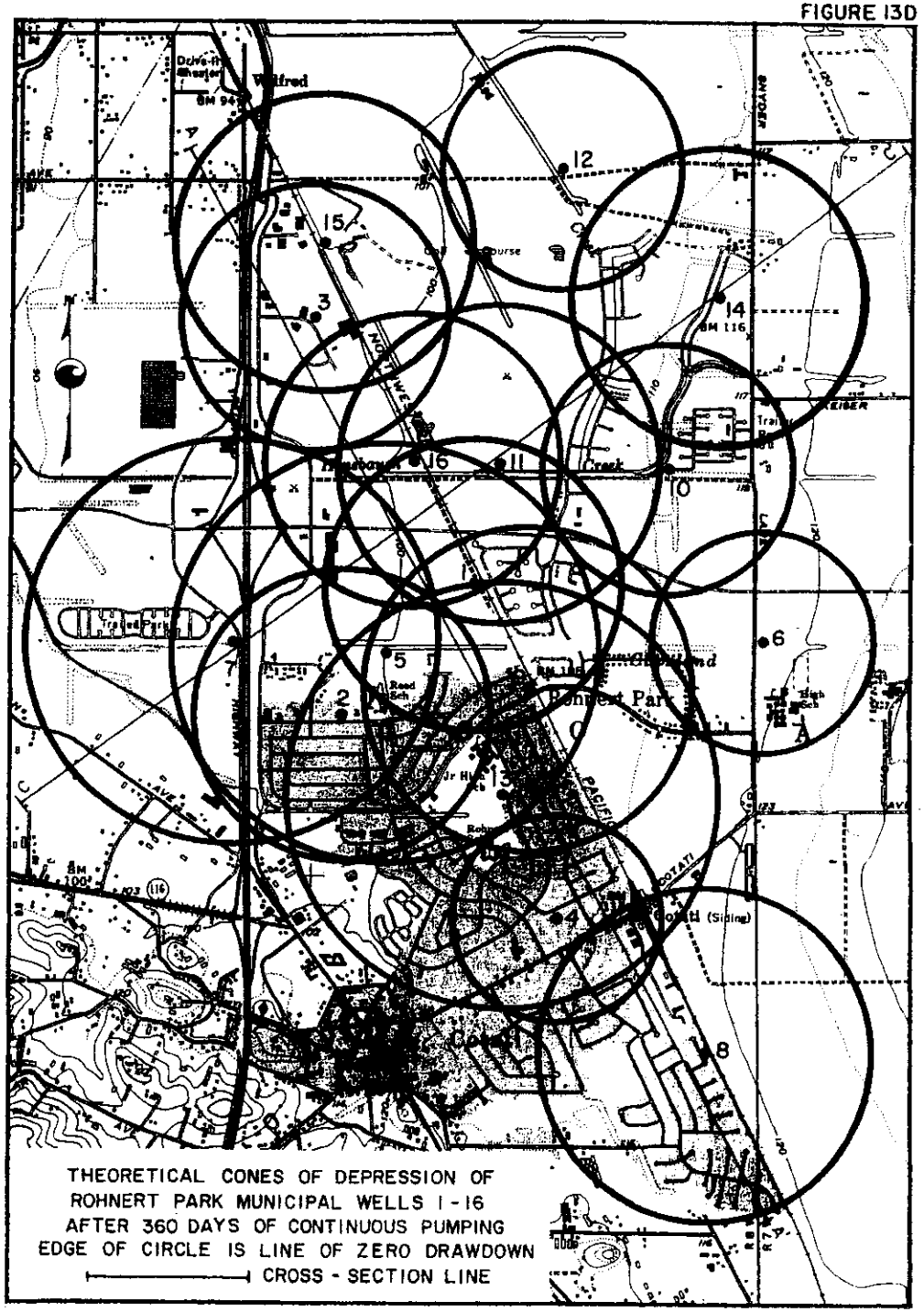
(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)



Cones of depression for 16 Rohnert Park municipal wells.

360 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)



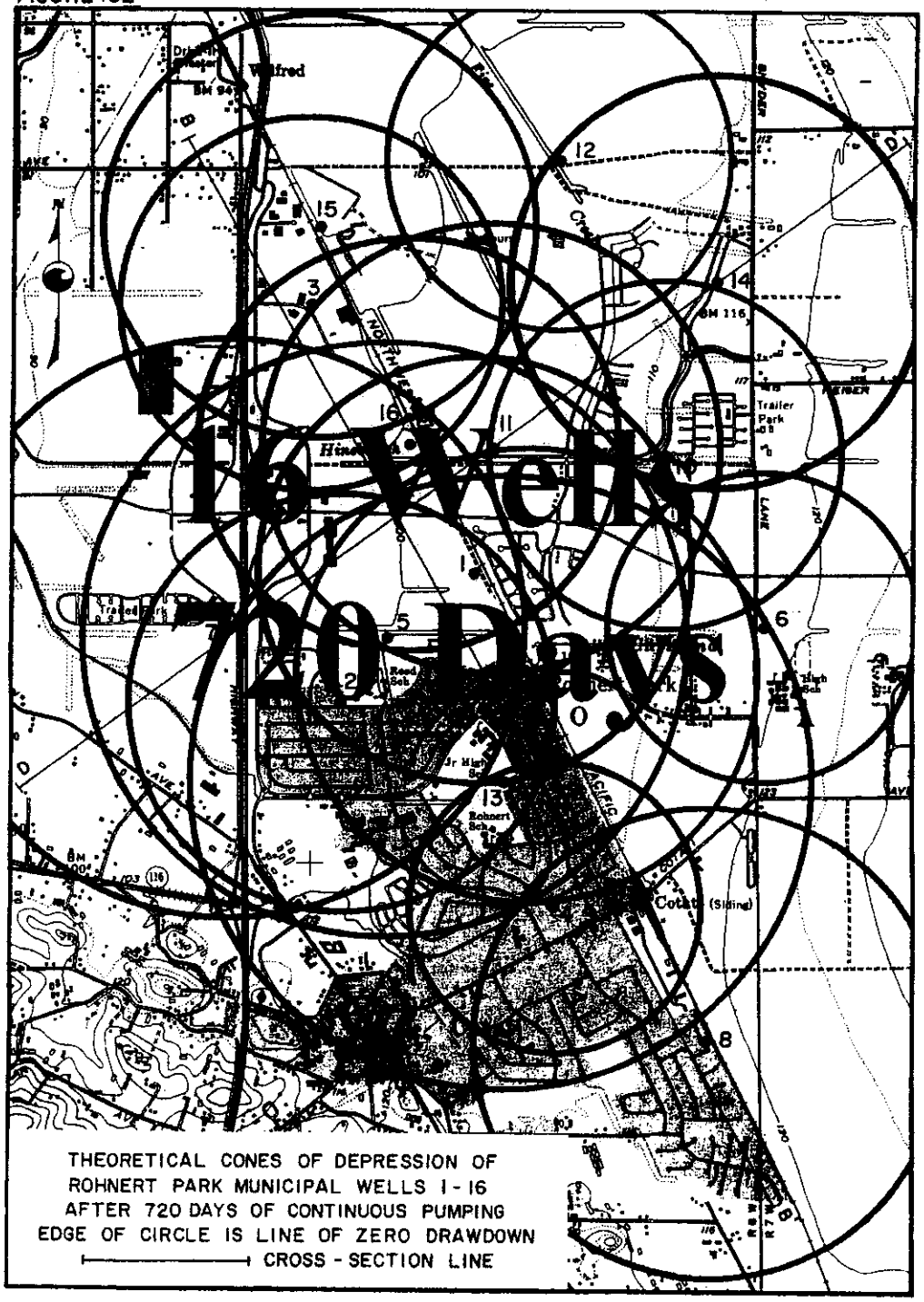
What is the impact of

42 Wells
9000 Days
since 1958

?

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13E



DEIS SCOPING COMMENTS, GRATON RANCHERIA CASINO PROJECT

NEPA/CEQA SCOPING QUESTIONS FOR A PROPOSED INDIAN CASINO IN ROHNERT PARK, CA

"Congress ...declares that it is the continuing policy of the federal government, in cooperation with state and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic and other requirements of future generations of Americans." [42 U.S.C. 4331 (a)]

PROPOSED PROJECT & SITE

The site chosen by the Federated Indians of Graton Rancheria (FIGR) and Station Casinos for the location of their proposed casino is 360± acres on Stony Point Road, between Rohnert Park Expressway and Wilfred Avenue. If successful, the casino resort will include a 300 room hotel - the largest in Sonoma County - a full-service spa, five restaurants, an events center and a food court. The casino will feature 2,000 slot machines, 120 gaming tables and a large bingo facility.

1. COASTAL BARRIERS & PROJECT WETLANDS

1.1 Is the project located within a coastal barrier designated on a current FEMA flood map or Department of Interior coastal barrier resources map?

1.2 Are there drainage ways streams, rivers, or coastlines on or near the project site?

1.3 Are there ponds, marshes, bogs, swamps or other wetlands on or near the site?

1.4 Is the project located within a wetland designated on a National Wetlands Inventory map of the Department of Interior (DOI)?

1.5 Does the project comply with Executive Order (E.O.) 11990, Protection of Wetlands, which discourages federal funding of new construction or filling in wetlands and compliance is required with the wetlands decision-making process (§ 55.20 of 24 CFR Part 55). The applicant should use Part 55 published in the Federal Register on January 1, 1990 for wetland procedures).

2. FLOOD MANAGEMENT

2.1 Is the project located within a floodplain designated on a current FEMA flood map? (24 CFR Part 55).

NIGC Scoping Comments by April 1, 2004 to :

Christine Nagle, NEPA Coordinator, National Indian Gaming Commission,

1441 L Street, NW., 9th Floor, Washington, DC 20005, telephone (202) 632-7003.

Submitted by Marilee Montgomery see address on header

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GAMING COMMISSION
2004 MAR 25 PM 2:35

2.2 Is the proposed building footprint located in a Special Flood Hazard Area identified on a current Flood Insurance Rate Map (FIRM)?

2.3 Do proposed construction plans accommodate and comply with Uniform Building Code requirements of facilities constructed within Special Flood Hazard Areas?

2.4 Identify whether the project site is in a 100 year or 500 year FEMA/FIRM Floodplain and describe mitigation and construction modifications to ensure compliance with the appropriate floodplain designation.

3. HISTORIC PRESERVATION

3.1 Has the State Historic Preservation Office (SHPO) been notified of the project and requested to provide comments?

3.2 The proposed project site is immeidiately adjacent to what was was known during World War II as the "Outer Landing Field - Cotati" from 1943 - 1948, which contained two runways, an Operational and Control Tower, fire and crash truck building, gasoline and oil storage, both above and below ground, a small arms magazine and a machine gun range. Aside from the contamination issues addressed in another section of this report, the site has an existing alternate use as a commemorative, historic space to recognize the American War effort in World War II. Explain why the applicant's project should forever prevent this alternate use; or in the alternative, how the applicant proposes to blend historic recognition of the site's history with the proposed use of the applicant's project. (Please refer to attached "Outer Landing Field -Cotati Report). Why should the applicant's proposed economic use trump America's potential historical use at the project site?

3.3 Is the property listed on or eligible for listing on the National Register of Historic Places?

3.4 Is the property located within or directly adjacent to an historic district?

3.5. Does the property's area of potential effects include an historic district or property?

4. NOISE ABATEMENT

4.1 Is the project located near a major noise source, i.e., civil airports (within 5 miles), military airfields (15 miles), major highways or busy roads (within 1,000 feet), or railroads (within 3,000 feet)?

4.2 Does the project comply with 24 CFR 51, Subpart B that requires a Noise Assessment for proposed new construction?

4.3 Has a noise contours map been developed for the proposed project and does it show Day-night average sound level (abbreviated as DNL)?

4.4 What procedures or guidelines will be developed that allows community members or adjacent property owners to formally complain about inordinate or unanticipated noise?

5. PROJECT RELATED HAZARDOUS MATERIALS

5.1 Is the site listed on an EPA Superfund National Priorities or CERCLA, or equivalent State list?

5.2. If the site is not currently listed on sites described in 5.1 above, should it be? If not, why not?

5.3 Does the project proposal include a full inventory and assessment of all hazardous materials associated with the project?

5.4 Does the applicant propose to handle or sell explosives (fireworks) or propose to store fire-prone materials such as liquid propane, gasoline, or other storage tanks above or below ground?

5.5 Does the proposed project comply with public all safety requirements for fire safety, in accordance with state and federal law?

5.6 Has the applicant developed a public safety evacuation and rescue plan for customers, and does the plan accommodate projected customers based upon high or low attendance that is associated with hours of operations, weekdays, holidays, and special events?

5.7 Is the site located within 3,000 feet of a site of known toxic contamination or a solid waste landfill site?

5.8 Were underground storage tanks ever located on the site? If so, provide documentation that all underground storage tanks have been identified, located and appropriately removed by qualified professionals, using current techniques in compliance with 40 CFR Part 280.

5.9 Are there any unresolved hazardous materials issues at the proposed site that could the state, county or a municipality to be determined to be potential responsible party?

5.10 Please review, thoroughly respond, and identify actions and mitigations proposed for each of the hazardous materials and contamination findings noted in the attached ***"Outer Landing Field-Cotati Report"*** attached to this questionnaire.

6. AIRPORT HAZARDS

6.1 Is the project within 3,000 feet from the end of a runway at a civil airport?

6.2 Is the project within 2 and 1/2 miles from the end of a runway at a military airstrip?

7. WATER

7.1. The SR plain groundwater/aquifer is already at drawdown. Sebastopol wells and aquifer may be impacted by the proposed project. This property is state mandated recharge land. What is the aquifer recharge analysis for this property?

7.2 How much water is needed for the proposed project and future project expansions proposed over the next twenty years?

7.3 How will the applicant's tribal water rights impact adjacent water rights of landowners, the municipality and county in which the project is proposed to be located?

7.4 What long-term written assurances will the applicant provide for the ongoing monitoring of water usage and water rights of the applicant and the proposed project in relationship to the currently identified and future water usage and rights of adjacent landowners, the municipality, county and state over the next twenty years?

7.5 Will the proposed project affect a sole source or other aquifer?

7.6 The Santa Rosa Plain Groundwater Basin and other adjoining groundwater basins are currently and seriously overdrafted, and further threatened by the continual loss of natural recharge. Explain why this would not constitute a fatal flaw to the proposed project.

7.7 In August 2003 the General Manager for the Sonoma County Water Agency issued a letter stating that water suppliers (including local municipalities) should not rely on delivery estimates of the Agency's 2000 Urban Water Management Plan because the Agency does not have an adequate 20 year supply. Please explain why this lack of available water supply would not constitute a fatal flaw to the proposed project.

7.8 What is the total anticipated impervious surface coverage estimated for the proposed project?

7.9 What percentage of the project site is proposed for impervious surface, and how does this surface impact existing elements addressed in Section 1 above?

7.10 Is the site currently served by an adequate and acceptable water supply?

7.11 What impacts will occur from stormwater runoff at the proposed site?

7.12 How will the applicant coordinate and comply with the Regional Water Quality Control Board?

7.13 The property currently contains a Water District drainage canal traversing the site. How will this canal be impacted by project activity, and what mitigations will be proposed that will comply with Water District requirements and needs of the existing canal?

7.14 What mitigations are proposed for water supplies of the proposed project that will not affect or will ameliorate water supplies of adjacent residential neighborhoods businesses, and other land uses currently receiving adequate water?

7.15 How will the applicant assure the local government and surrounding community that costs associated with increased water supply needs of the project will be fully accommodated by the applicant, and not a burden imposed upon local governments, local water districts or providers, or local property owners?

7.16 In September 2003, the "Kleinfelder Report," commissioned by the Sonoma County Board of Supervisors confirmed a long-foregone conclusion that the County's groundwater basin complex is experiencing serious water scarcity. This report verifies that "at a minimum, substantial evidence under CEQUA exists that a cumulative groundwater impact exists." Explain why, based upon this report, a serious lack of water availability is not a fatal flaw to the proposed project.

8. SEWER, SANITATION AND WASTE DISPOSAL

8.1 Are there current sanitary sewers and waste water disposal systems serving the site?

8.2. How will current sanitary sewers and waste water disposal systems be impacted by the proposed project, and at what cost?

8.3 What additional sanitary sewer and wastewater disposal systems are required and how will expansions of such infrastructure impact existing, connecting infrastructure in terms of capacity and annual cost?

8.4 If the project water supply is non-municipal, has an acceptable "system" been designed, and approved by appropriate state and local authorities and agencies?

8.5 Will the applicant be involved in joint partnerships or mutual agreements with municipal or county entities for the purpose of provision of sewer, sanitation or waste disposal?

8.5.1 If the answer to 8.5 is yes, has the municipal or county partner developed an environmental impact assessment in association with provision of infrastructure to the project?

8.5.2 If the answer to 8.5 is yes, has the municipal or county partner developed an economic impact assessment in association with provision of infrastructure to the project?

8.6 What long-term written assurances will the applicant provide for the ongoing monitoring of wastewater needs of the applicant and the proposed project in relationship to the currently identified and future wastewater needs and rights of adjacent landowners, the municipality and county over the next twenty years?

9. ENVIRONMENTAL JUSTICE

9.1 Is the project located in a predominantly minority or low-income neighborhood?

9.2 Does the project site or neighborhood suffer from disproportionately adverse environmental effects on minority and low-income populations relative to the community-at-large?

10. UNIQUE NATURAL FEATURES AND AREAS

10.1 Is the site near natural features (i.e., bluffs or cliffs) or near public or private scenic areas? If so, what site and construction adjustments have been determined to protect scenic viewsheds or other zoning requirements, expectations or public entitlements?

10.2 Are other natural resources visible on site or in the vicinity? Will any such resources be adversely affected or will they adversely affect the project?

11. ENDANGERED SPECIES

11.1 What will the impact of impervious surface be upon existing vernal pools on the project site?
11.2 What plan will be developed to accommodate preservation or mitigation or replacement of vernal pools at the project site?
11.3 The following species have been identified as present at the project site, and are listed on the Endangered Species Act list of endangered species. How will the applicant address the project's threat to the habitat of the following:

11.3.1 Showy Indian Clover (Trifolium amoenum)
Federal Register 62:54791, 10/22/1997)

11.3.2 Burke's Goldfields (Lasthenia burkel)
Federal Register 56: 61173, 12/02/1991

11.3.3 Sonoma Sunshine (Blennosperma Baken)
Federal Register 56:61173; 12/02/1991

11.3.4 Sebastopol Meadowfoam (Limnanthes vinculans)
Federal Register 5: 61173, 12/02/1991)

11.3.5 Tiger Salamander (Ambystoma californiense)
Classification: U.S. Fish & Wildlife Service Endangered Species.

12. SITE SUITABILITY

12.1 What are the previous uses of this site and what residual impacts affect the project or are affected by the project? (See attached ***"Outer Landing Field-Cotati Report"***).

12.2 Is there paved access to the project site?

12.3 Are there unusual conditions on the site?

12.4 Is there any indication of currently distressed vegetation?

12.5 Are there waste materials or containers on site?

12.6 Are there pools of liquid or soil staining, chemical spills, abandoned machinery, cars, refrigerators, etc.?

12.7 Are there existing or abandoned transformers, fill/vent pipes, pipelines, drainage structures?

12.8 Is the project compatible with surround areas in terms of:

12.8.1 Land use?

12.8.1.1 The proposed project would remove 360± acres of prime agricultural land within the County community separators, and is inconsistent with Sonoma County's General Plan as well as the Rohnert Park General Plan. How will the applicant accommodate the smart growth principles of these two significant planning documents of the county and municipality?

12.8.1.2 The propose site is in the Williamson Act - agricultural preserve designation? What will be done to offset removal of this substantial land base from the Williamson Act agricultural preserve?

12.8.2 Height, bulk, mass?

12.8.3 Building type (low/high-rise)?

12.8.4 Building density?

12.9 Will the project influence or be unduly influenced by:

12.9.1 Building deterioration?

12.9.2 Postponed maintenance?

12.9.3 Obsolete public facilities?

12.9.4 Transition of land uses?

12.9.5 Incompatible land uses?

12.9.6 Inadequate off-street parking?

12.10 The project site is included in the General Plan for the City of Rohnert Park adopted July 2000, 4th Edition. The City includes the 360 acre property in its Planning Area, and has designated the property "*Open Space-Agriculture and Resource Management*" defined as:

"This designation includes orchards and cropland, grasslands, and very low density rural residential areas, not to exceed one housing unit per 20 to 40 acres,

provided that one housing unit may be built on each existing parcel. Agriculture is permitted with fewer restrictions on keeping animals than in residential classifications. This classification will also accommodate any greenbelts and/or urban buffer areas that may be designate din the future. Greenbelts are open space, park land, and agricultural areas located outside urban areas, as opposed to urban parks located within developed areas."

How will the project applicant address the current General Plan designation for the project site?

12.11 Will the applicant provide mitigation offsets for the loss of Open Space-Agricultural land to the community? Please describe how such offsets might be developed, replaced or reimbursed to the County of Sonoma and/or the City of Rohnert Park?

12.12 The project is directly related to three significant elements of the Rohnert Park General Plan: Land Use and Growth Management; Community Design and Housing elements. How will the applicant ensure that the project comports and complies with these three critical elements of the municipality's General Plan?

13. AIR QUALITY

13.1 Are there proposed air pollution generators associated with the proposed project, such as those listed below, and if so, how will the applicant mitigate each of the following:

13.1.1 Incinerators

13.1.2 Power generators

13.1.3 Large parking facilities (1,000 or more cars)

13.1.4 Heavily traveled highways, adjacent and onsite road systems.

13.1.5 Will the project affect or be affected by nuisance odors? What mitigations are proposed?

14. SOIL CONDITION, QUALITY, STABILITY, EROSION AND DRAINAGE

14.1 Describe the site elevations and any accommodations required for significant slopes.

14.2 Is there evidence of slope erosion or unstable slope conditions on or near the site?

14.3 Is there any visible evidence of soil problems (foundations cracking or settling, basement flooding, etc.) in the vicinity of the project site?

14.4 Have soil reports or studies or borings been made for the project site or the area? If so, what are the findings of soil studies accomplished?

14.5 Is there indication of cross-lot runoff, swales, drainage flows on the property?

14.6 Are there visual indications of filled ground? What assurances has the applicant developed to ensure soil stability for construction footprint and impervious surfaces?

14.7 Are there active rills and gullies on the project site?

14.8 Have structural borings or dynamic soil analysis been requested in association with geological studies?

14.9 Please review the attached ***"Open Space, Water Resource Protection, Land Use ("O.W.L.") Foundation Report,"*** and respond to each of the area water management, area water crisis, and groundwater overdraft scenarios described, by providing definitive explanations of mitigations proposed to ameliorate these significant issues over the next twenty years.

14.10 Please review the attached September 2003 ***"Kleinfelder Report,"*** commissioned by the Sonoma County Commissioners, and respond to each of the groundwater basin complex scarcity scenarios described therein, with a definitive explanation of appropriate mitigations for each of the basins over the next twenty years.

15. NUISANCE AND HAZARDS

15.1 Will the project be affected by seismic faults, or fractures?

15.2 Will the project be affected by wind/sandstorm concerns?

15.3 Will the project be impacted by poisonous plants, insects or animals onsite?

15.4 Are there unprotected water bodies on site?

15.5 Are there other hazardous terrain features?

16. ROADS, TRAFFIC AND TRANSPORTATION

16.1 Current traffic on Highway 101, Stony Point Road, and Highway 116 are all at capacity. Feeder road and alternate routes to bypass the casino will all be impacted. What are the impacts based on traffic studies?

16.2 How will traffic generated by the proposed project impact the entire Highway 101 corridor?

16.3 What will be the relationship of traffic generated by the proposed project to a point in time when Caltrans has a capability to increase carrying capacity?

16.4 Has a traffic study been developed for the proposed project that is specific to this site and this project, and not just generic to the proposed industry?

16.5. Has a traffic study accommodated existing traffic counts experienced at the project site, and then projected appropriate increased traffic counts based upon days of the week, hours of the day or night, and special events?

16.6 Has a traffic study calculated existing road maintenance requires with anticipated road maintenance or road expansion needs to accommodate the project? What are project costs associated with this subject?

16.7 What is the projected weekly, daily and hourly traffic count for the site, and how does this translate to an annual traffic increase that impacts adjacent properties and neighborhoods?

16.8 What mitigations are proposed to accommodate traffic generated by the proposed project with existing traffic counts and flows at and adjacent to the project site?

16.9 Will the project affect or be affected by hazardous streets?

16.10 Will the project affect or be affected by dangerous intersections.

16.11 What mitigations (i.e. traffic signals, traffic security personnel, shuttle services) are proposed to ameliorate significant traffic increase and activity associated with the proposed project? What is this cost and how will it be accommodated without affecting costs of adjacent local governments?

16.12Are there established biking and pedestrian pathways at or near the vicinity of the project site, and if so, what mitigations does the applicant propose to ensure the safety and non-interference of use of these public pathways?

16.13 How will the project impact existing public transportation facilities of the community?

16.14How will the applicant ensure that increased capacity needs of public transportation will be accommodated at the sole expense of the applicant and not the adjacent local governments?

16.15 Will private transportation systems be required and/or implemented in association with the project?

16.16 How will any proposed private transportation systems impact and/or coordinate with public transportation systems currently in operation?

16.17 The following components, identified within a Memorandum of Understanding (MOU) between the applicant and City of Rohnert Park, are not currently contemplated nor incorporated into the Transportation Element of the City's General Plan:

- Widening of Rohnert Park Expressway
- Installation of on-demand activated traffic light at the entrance to the Rancho Verde Mobile Home Park
- Unspecified financial and other contributions to the Wilfred Avenue/Golf Course interchange construction and Highway 101 widening from Wilfred Avenue to Old Redwood Highway

- Traffic engineering study to identify significant off-reservation impacts on traffic resulting from the project and potential measures to mitigate such impacts.

How will a traffic engineering study address these additional roadway improvements, and what mitigations will be provided to ensure that all roadway improvements and traffic activity will be mitigated to a point of compliance with the municipal General Plan?

17. CHILDREN, SCHOOLS, CHURCHES, PARKS, AND RECREATION

17.1 Please describe the impact and define proposed mitigations for the following public safety concerns related to children attending, arriving and departing from the following:

17.1.1 Sixteen (16) preschools located within a two-mile radius of the proposed project site.

17.1.2 Eight (8) elementary schools within a two-mile radius of the proposed project site.

17.1.3 Two (2) middle schools within a two-mile radius of the proposed project site.

17.1.4 One (1) high school, (1) one middle school and (1) one elementary school within one-half mile of the proposed project site

17.2 Are there other usual and customary children's play areas within the vicinity of the project site?

17.3 Do public school buses travel the road systems associated with the project site, and if so, how will traffic mitigations proposed by the applicant ensure safe and timely schedules for public school transportation needs?

17.4 Are there usual and customary recreational areas in the vicinity of the project site that are currently utilized by the adjacent community, and if so, how will the users of these recreation areas be affected by the project?

17.5 Will the proposed project increase a need for onsite or offsite daycare facilities for children, and how will the applicant accommodate such need, inclusive of safety of children to and from day care facilities?

17.6 There are a total of twenty-eight (28) churches located within a two mile radius of the propose project site. How will the project impact the following:

17.6.1 Five (5) churches within one-half mile of the project site.

17.6.2 Four (4) additional churches within one mile of the project site.

17.6.3 Nineteen (19) additional churches within two miles of the project site.

17.7 Based upon credible data from scholarly or other professional sources, please quantify a project impact upon churches for counseling regarding associated impacts over the next ten years, of gambling such as divorce, job terminations, home foreclosure, gambling addictions, and crimes of embezzlement, theft or fraud.

18. LIGHT AND GLARE

18.1 How will the applicant assess project site light and glare to adjacent properties?

18.2 What mitigations will ensure that onsite and offsite light and glare will comport with adjacent local government light, glare and signage requirements?

18.3 What procedures are proposed for adjacent neighbors who wish to legitimately complain of excessive light or glare?

19. COMMERCIAL AND/OR RETAIL ANCILLARY USES

19.1 Please identify each and every commercial use proposed upon project completion, and projected over the next ten (10) years at the project site.

19.2 Please identify an anticipated customer and weekly/daily/hourly traffic count associated with each commercial or ancillary use planned in the near-term and long-term use of the project site.

19.3 Please project estimates of revenue associated with each gambling, commercial or retail site and equate that to an equivalent sales tax loss of disposable income to adjacent local communities.

20. HOUSING & OVERNIGHT TOURIST ACCOMMODATIONS

20.1 Has the applicant studied the current housing stock and occupancy rates of adjacent communities? If so, how will a project workforce impact:

20.1.1 Local community housing needs, projected over the next ten years.

20.1.2 Local housing sales and rental rates, projected over the next ten years.

20.1.3 Local housing over-crowding and code enforcement conditions that might impact adjacent communities, projected over the next ten years.

20.2 How will the applicant contribute to a stable and affordable housing stock supply consistent with the applicant's proposed workforce housing needs?

20.3 Within one-third mile of the proposed site are substantial, high-end residential properties adjacent to golf course open space. Please assess and predict the impact upon market value and quality of life over the next ten years, to this premier residential community in Rohnert Park.

20.4 How will the project impact existing hotels, motels, RV facilities and other overnight tourism lodging facilities?

20.5 If the applicant proposed to construct hotel or motel facilities at or adjacent to the proposed project, please calculate the estimated impact of business to existing tourist facilities, and the projected hotel occupancy tax loss to adjacent local governments, over the next ten years.

21. LOCAL ECONOMIC IMPACTS

21.1 What nationally accepted professional or scholarly data is the applicant using to evaluate the impact of an Indian gambling casino upon the foreseeable disposable income loss to adjacent commercial, retail, restaurant, recreational and lodging facilities, over the next ten years?

21.2 Please describe whether or how the applicant proposes to hire a local workforce, and how this potential transition of workers from current employment to future employment with the applicant might impact the local workforce?

21.3 Does the applicant anticipate hiring a workforce from outside of the immediate community? If so, from what sources will the applicant recruit its workforce?

21.4 The loss of property tax, sales tax and transient occupancy tax to the adjacent municipality and county will be substantial. What written assurances and what commensurate annual financial reimbursement will the applicant propose and provide, without risk of a municipality incurring enforcement or litigation costs to receive such offsets? How will the applicant ensure timely delivery of such offsets?

21.5 What commensurate annual financial contributions are proposed to mitigate the loss of disposable income flowing from private sector businesses to the applicant's tax exempt activities at the project site over the next twenty years?

21.6 The proposed project is in the immediate vicinity of major entertainment venues that will undoubtedly suffer negative economic impacts. How will the applicant mitigate against loss of attendance and subsequent loss of revenue for such facilities as the Luther Burbank Center, Spreckles Center and Green Center?

21.7 What are the cumulative economic impacts to the private sector economy, locally and regionally of the proposed project over the next ten years?

21.8 What are the cumulative economic impacts to other Indian tribes within 100 miles of the project site over the next ten years?

22. LAW ENFORCEMENT, CRIME AND PUBLIC SAFETY

22.1 How will activity at the proposed site impact resources of local, county and state law enforcement resources, over a projected ten-year period?

22.2 What law enforcement and public safety plans have been developed for the proposed project that will be commensurate with area law enforcement and public safety needs projected over a ten year period?

22.3 What cost mitigations is the applicant proposing to offset impacted and increased law enforcement personnel needs of agencies serving the proposed project?

22.4 What nationally accepted professional or scholarly data is the applicant using to evaluate the impact of hard (i.e., robbery, vandalism, assault) and soft (white-collar larceny, embezzlement, fraud) crime traditionally associated with the gambling industry entrenching into a community previously unaffected by gambling?

22.5 What mitigations in terms of personnel, monitoring systems, training and counseling programs is the applicant proposing to minimize the impact of anticipated crime associated with the gambling industry.

22.6 In the current status of our nation at war, what provisions will the applicant propose in the event of a terror attack at the site of the applicant's facility, or within the proximity of Rohnert Park and Sonoma County?

22.6.1 What emergency preparations (i.e. food, water, generators) and what capability will the facility offer as a temporary shelter in the event of an emergency?

22.6.2 The applicant's project will attract a continual presence of tourists who do not reside in the immediate vicinity. What provisions will be made to provide for onsite customers for a period of 72 hours or more?

22.6.3 How will the applicant coordinate its emergency policies and strategies with the public safety plans of the City of Rohnert Park and Sonoma County?

22.6.4 How will the applicant assure a continual presence, participation in and contribution to regional emergency and public safety plans necessary to the safety and well being of its customers and adjacent municipal and county residents?

23. SOCIAL IMPACTS

23.1 Gambling invites gambling addiction. Please identify the credible data source from scholarly or other professional resources that will assist the applicant in developing a mitigation to address the increased prevalence of gambling addictions to residents of Rohnert Park and Sonoma County. What realistic percentage of the local customer base is likely to fall prey to addiction?

23.2 What onsite policies will the applicant propose to identify problem and at-risk gambling customers, and what measures will the applicant implement to deter or discourage an addicted gambler from frequenting the proposed facility?

23.3 What counseling services will the applicant provide to the Rohnert Park and Sonoma County area to provide a fully funded gambling addiction rehabilitation program, and how will the applicant ensure that this facility will be opened and available upon opening of the applicant's gambling facility?

24. **California Environmental Quality Act (CEQA) & State Policies**

24.1 What public participation timeline and process will be developed by the applicant to ensure compliance with a policy adopted by the California State Association of Counties on February 6, 2003 that requires an applicant to seek review and approval of a local jurisdiction that is consistent with state and local ordinances, including the California Environmental Quality Act (CEQA)?

24.2 How will the applicant ensure that it submits to the authority of a local jurisdiction over health and safety issues including, but not limited to, water service, sewer service, fire inspection and protection, rescue/ambulance service, food inspection, and law enforcement? What enforcement mechanisms or compliance leverage will be available to the local jurisdiction to ensure ongoing compliance of the applicant with the issues herein described?

25.0 ALTERNATIVE SITES

Based upon the questions posed in Sections 1 through 24 above, it is clear that the applicant's proposed project site is problematic at best, and likely fatally flawed for, among other substantial environmental impacts, extensive lead and other soil contamination cleanup needs, project water usage overdraws, and lack of water availability.

In several reports in the press in the Summer of 2003, the Tribe stated that it was "...actively looking at as many as a dozen alternate locations...." (*Betting Magazine*, June 12,2003). The Tribe did not then, nor has it to date, identified those alternate sites to the public. Therefore, for each of the applicant's alternative sites, please identify the location of each site and definitively explain why each and every site below is less suitable than the proposed site:

25.1 Site #1

25.2 Site #2

25.3 Site #3

25.4 Site #4

25.5 Site #5

25.6 Site #6

25.7 Site #7

25.8 Site #8

25.9 Site #9

25.10 Site#10

25.11 Site #11

25.12 Site #12

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

March 10, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W.
9th Floor
Washington,
DC 20005

Dear Ms. Nagle;

Thank you for your attention to our previous communication, including the O.W.L. Foundation's policy statement regarding a proposed Indian gaming casino on land already demonstrated to be in groundwater overdraft. We strongly urge you to deny any such request because a water consumer of this magnitude would further exacerbate Sonoma County's dwindling water supplies. Furthermore, establishing a federal water right directly on top of a groundwater overdraft area automatically would create an inherently unstable legal climate. In fact, a host of reasons argue against this particular location as a suitable casino site; our legal arm is submitting an expanded list of these reasons to you.

In May 2003 the United States Department of the Interior (DOI) issued a dire warning to all residents of the American West regarding immanent drought and the likelihood of potential conflicts arising from drought. The DOI specifically singled out an area of northern California that includes all of Sonoma County as having a "substantial conflict potential".

As early as 1972, the United States Geological Survey (USGS) mapped "water adequacy yields" in Sonoma County. The USGS determined that groundwater yields for Rohnert Park were "inadequate for heavy industry, irrigation and municipal [use]". Despite this warning, groundwater pumping continued and levels plummeted by as much as 150 feet.

In 1987 the Department of Water Resources (DWR) identified a huge "cone of depression" centered on Rohnert Park. A cone of depression of this size indicates massive pumping with no regard for the need to replenish groundwater levels through natural recharge. Almost no remedial efforts have been mounted to alleviate negative draft. Unfortunately, surface water is no longer an option to balance this over drafted water budget.

A recent legal decision has put into motion the eventual restriction of Eel River waters that usually swell the capacity of the Russian River. The Russian River is the single greatest source of surface water and <u>also</u> of groundwater, through natural recharge, in Sonoma County. These looming restrictions of Eel River waters mean less surface water availability for water contractors who are serviced by the Sonoma County Water Agency (SCWA) aqueduct. With limits being reached on groundwater availability and now with limits being imposed on surface water availability, there will be no way to make up any deficiencies (and that includes the inevitable naturally occurring droughts).

P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

I am including copies of the DOI statement and a DOI map showing clearly that the entire area encompassing Rohnert Park already has a "substantial conflict risk". Please also find the 1972 USGS information on "water yield adequacy" that describes water yields for all of Rohnert Park as inadequate for heavy industry, irrigation and municipal use. It is important to note that in 1979, 16 wells supplied water to Rohnert Park. Today, Rohnert Park has 42 municipal wells, 31 of which are active.

I am also including a DVD record of a February 19, 2004 Groundwater Forum held at the Environmental Center in Santa Rosa. This meeting, held under the aegis of the Redwood Chapter of the Sierra Club, outlined the serious nature of Sonoma County's groundwater crisis. Much of what the four expert speakers had to say that night will help you appreciate the inappropriateness of establishing a casino on the groundwater overdraft land near Rohnert Park.

Again, we urge you to deny any approval, sanction, or authorization of the proposed casino near Rohnert Park. There simply is not enough water to support such a huge undertaking.

If you have any questions or would like more information regarding this matter, I can be reached at the telephone number or email address on the letterhead.

Sincerely,

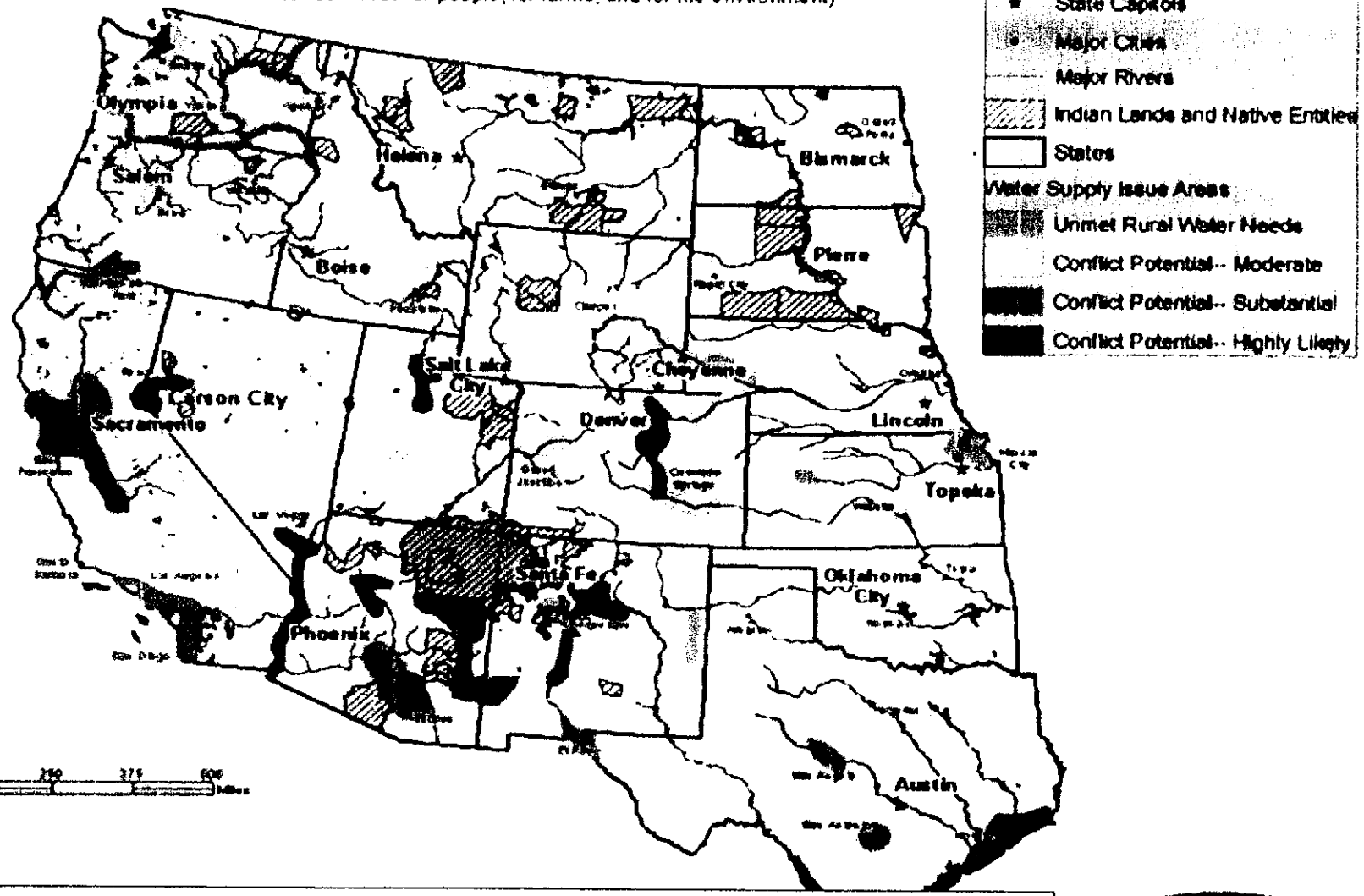
H.R. Downs
President
O.W.L. Foundation

The American West is facing a serious crisis. In the long run, we will not have enough water to meet the fast-growing needs of city residents, farmers, ranchers, Native Americans, and wildlife. The demand is increasing; the supply is not. It is time for Americans to become proactive in our efforts to resolve the problem. Crisis management is not a long-term solution.

- U.S Dept of Interior, 2003

Potential Water Supply Crises by 2025

(Areas where existing supplies are not adequate to meet water demands for people, for farms, and for the environment)



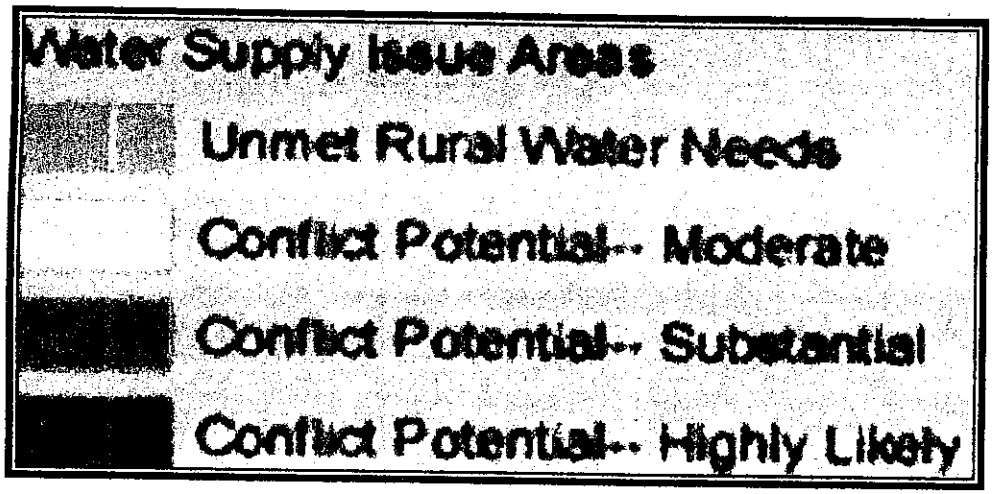
According to the U.S. Dept. of Interior (May 2003), many areas in the west face **"Potential Water Supply Crises by 2025"**

May 2003

Potential Water Supply Crises by 2025

- U.S. Dept. of Interior, May 2003

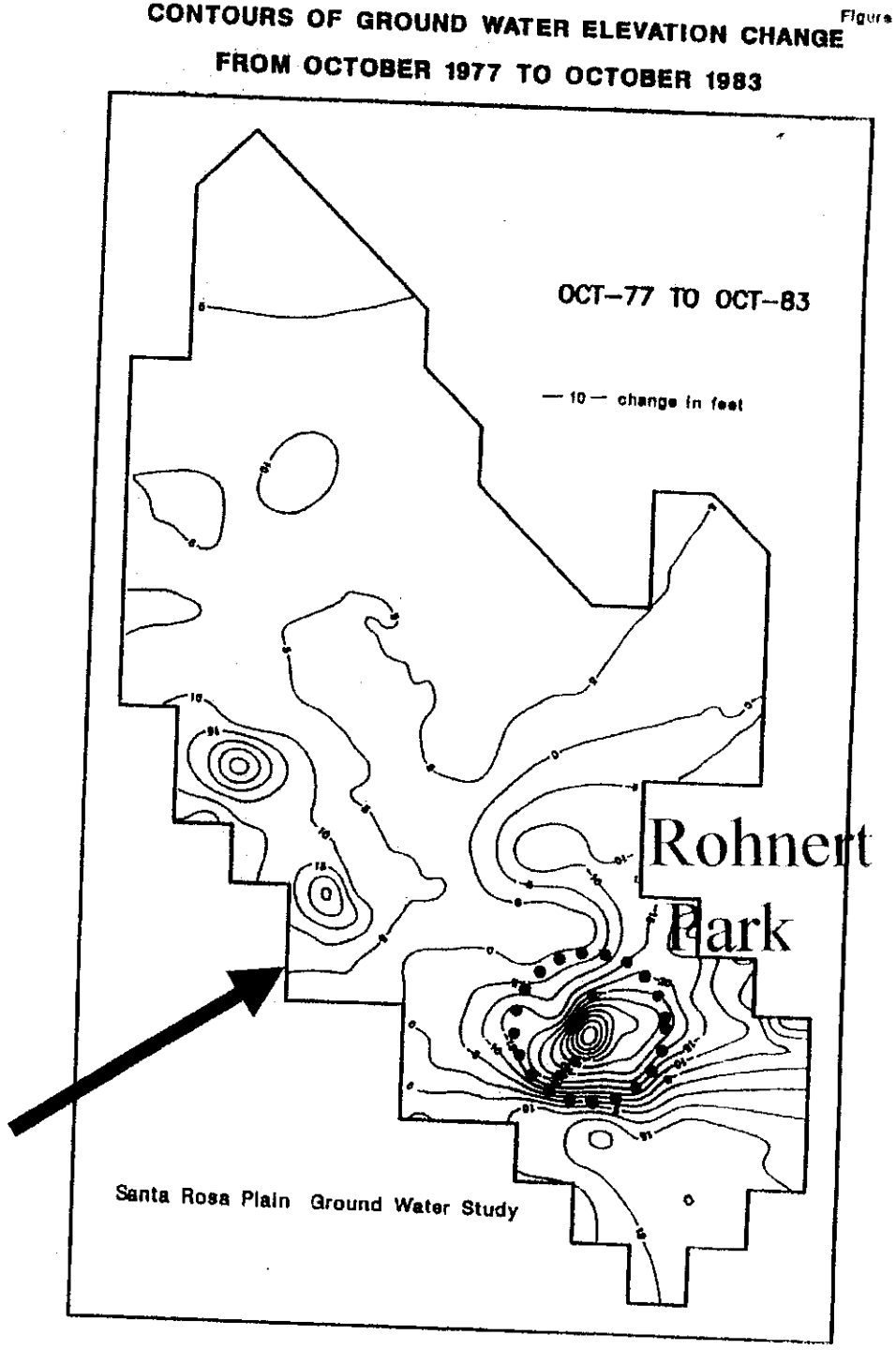
(Areas where existing supplies are not adequate to meet water demands for people, for farms, and for the environment)



Sonoma & Marin's water supply "*Conflict Potential*" compares to L.A. & Klamath Basin.

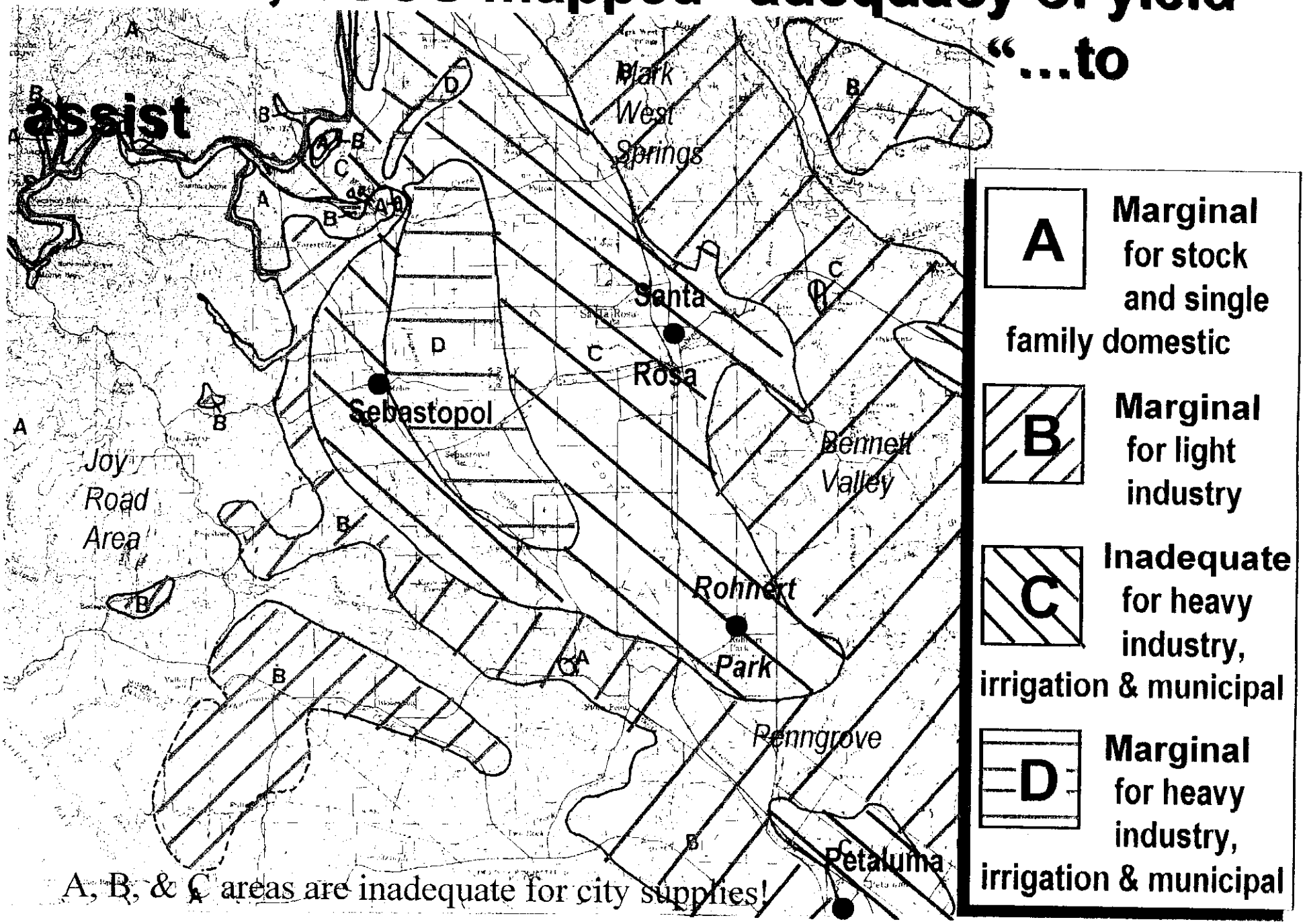
"*Conflict Potential*" in Sonoma & Marin is "*Substantial*"

Back in the 1980s, the California Department of Water Resources (DWR) identified a huge cone of depression centered in Rohnert Park.



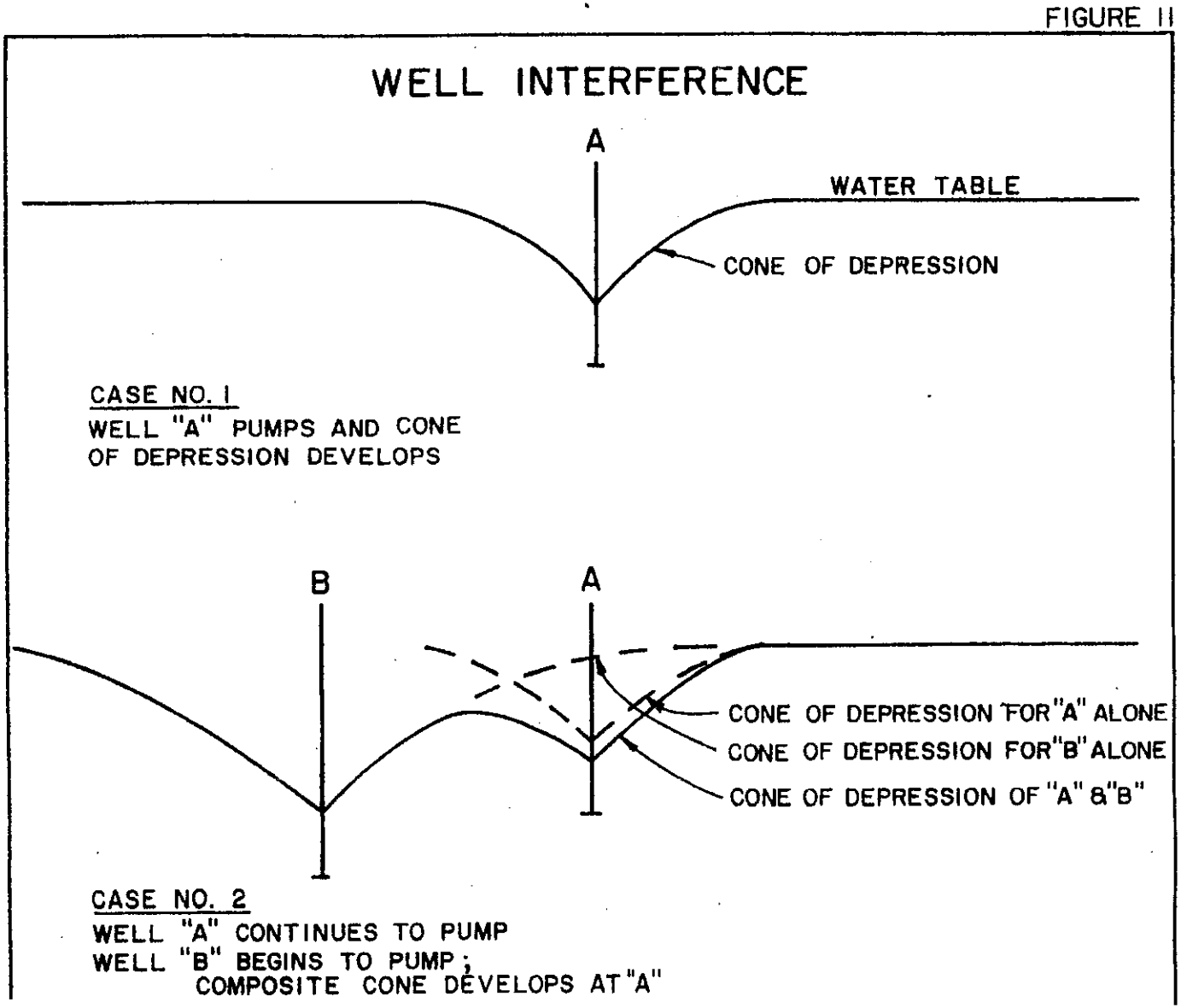
Santa Rosa Plain Ground Water Study (1987)

In 1972, USGS mapped "adequacy of yield" "...to assist



A, B, & C areas are inadequate for city supplies!

"Well Interference" illustrates how "cones of depression" affect water levels in wells.



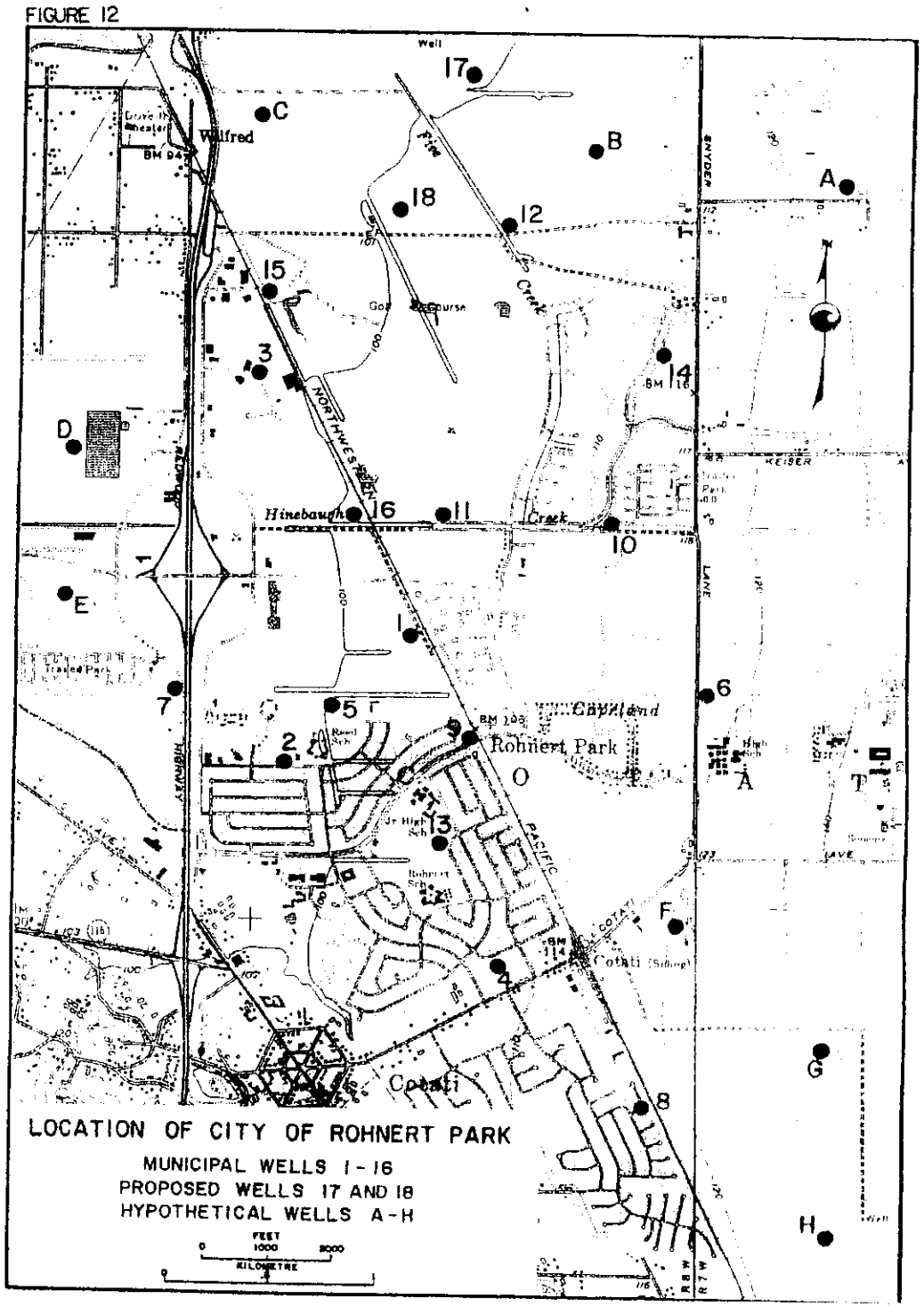
(Diagram from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

In 1979, 16 wells supplied water to Rohnert Park.

Today, Rohnert Park has 42 municipal wells, 31 of which are active.

Rohnert Park is also increasingly reliant on SCWA allocations.

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

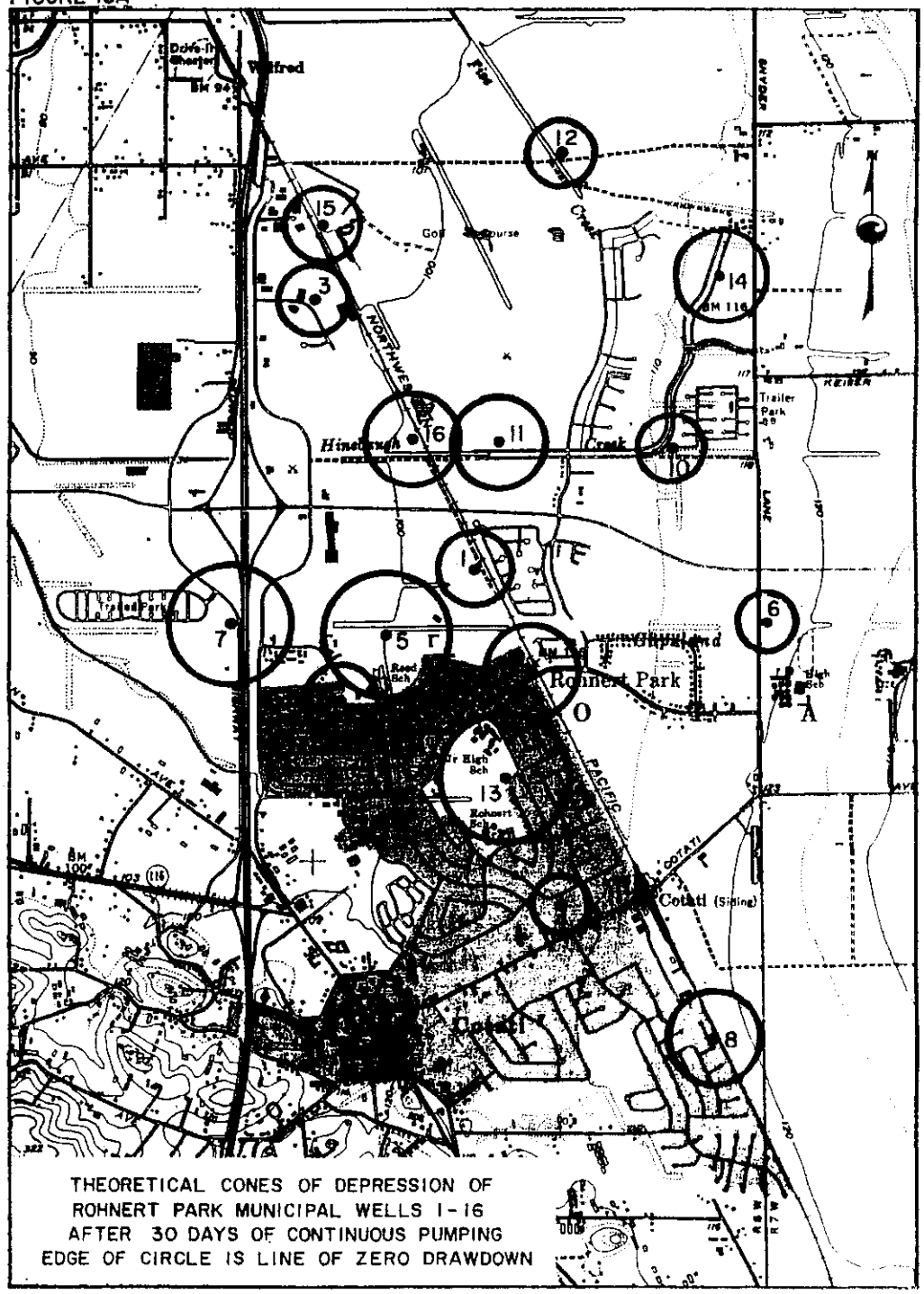


Cones of depression for 16 Rohnert Park municipal wells.

30 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13A

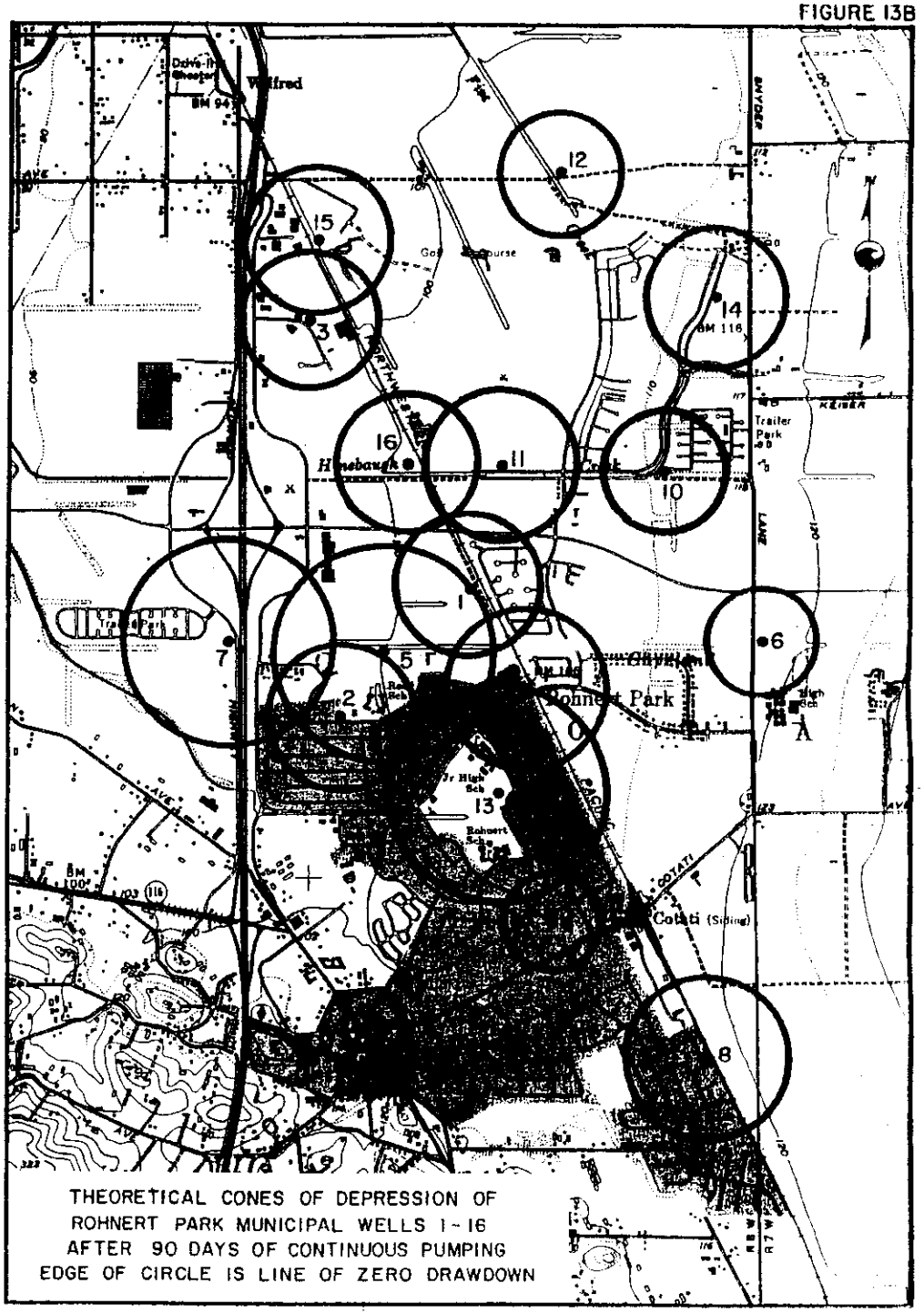


THEORETICAL CONES OF DEPRESSION OF ROHNERT PARK MUNICIPAL WELLS 1-16 AFTER 30 DAYS OF CONTINUOUS PUMPING EDGE OF CIRCLE IS LINE OF ZERO DRAWDOWN

Cones of depression for 16 Rohnert Park municipal wells.

90 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

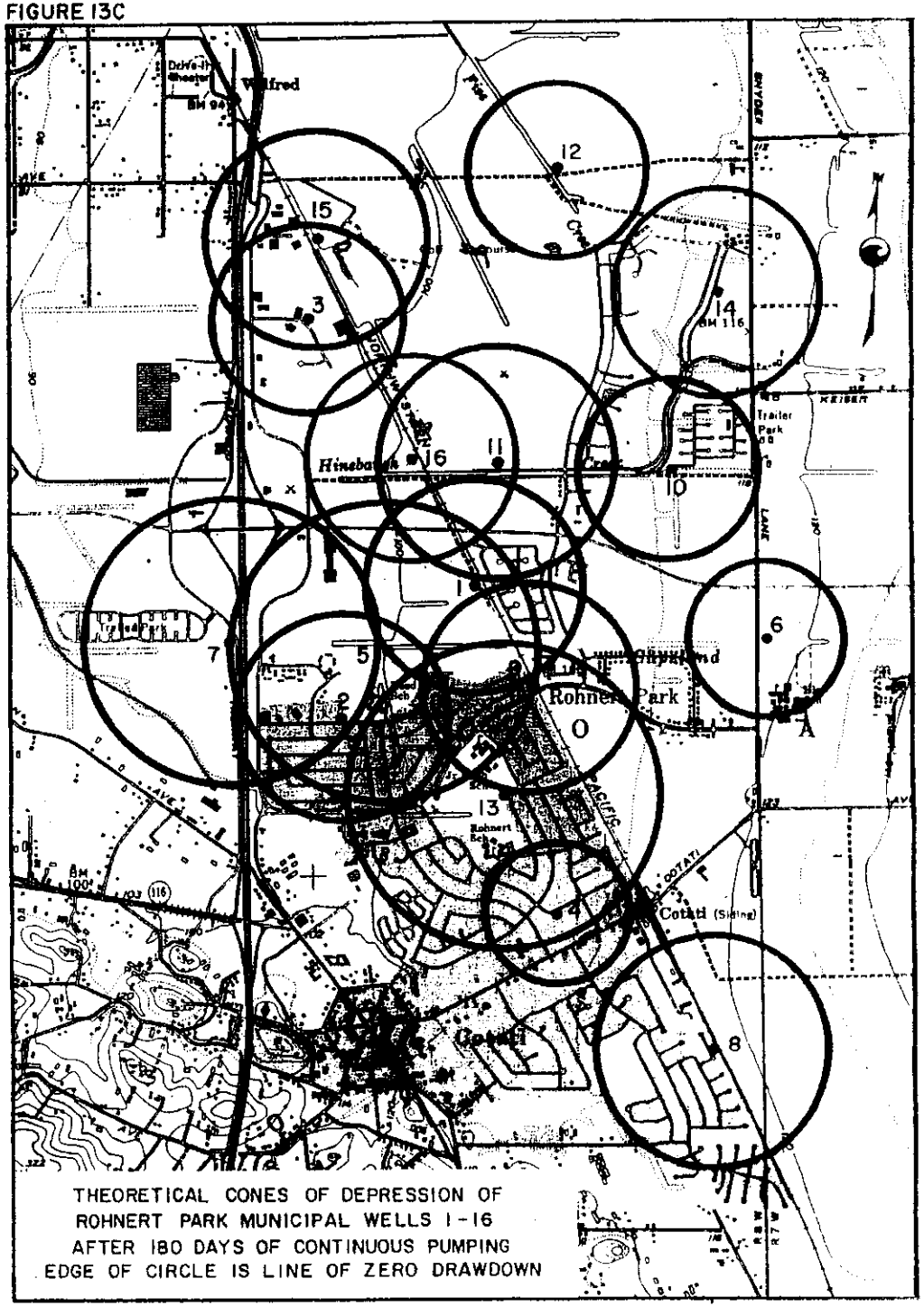


Cones of depression for 16 Rohnert Park municipal wells.

180 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

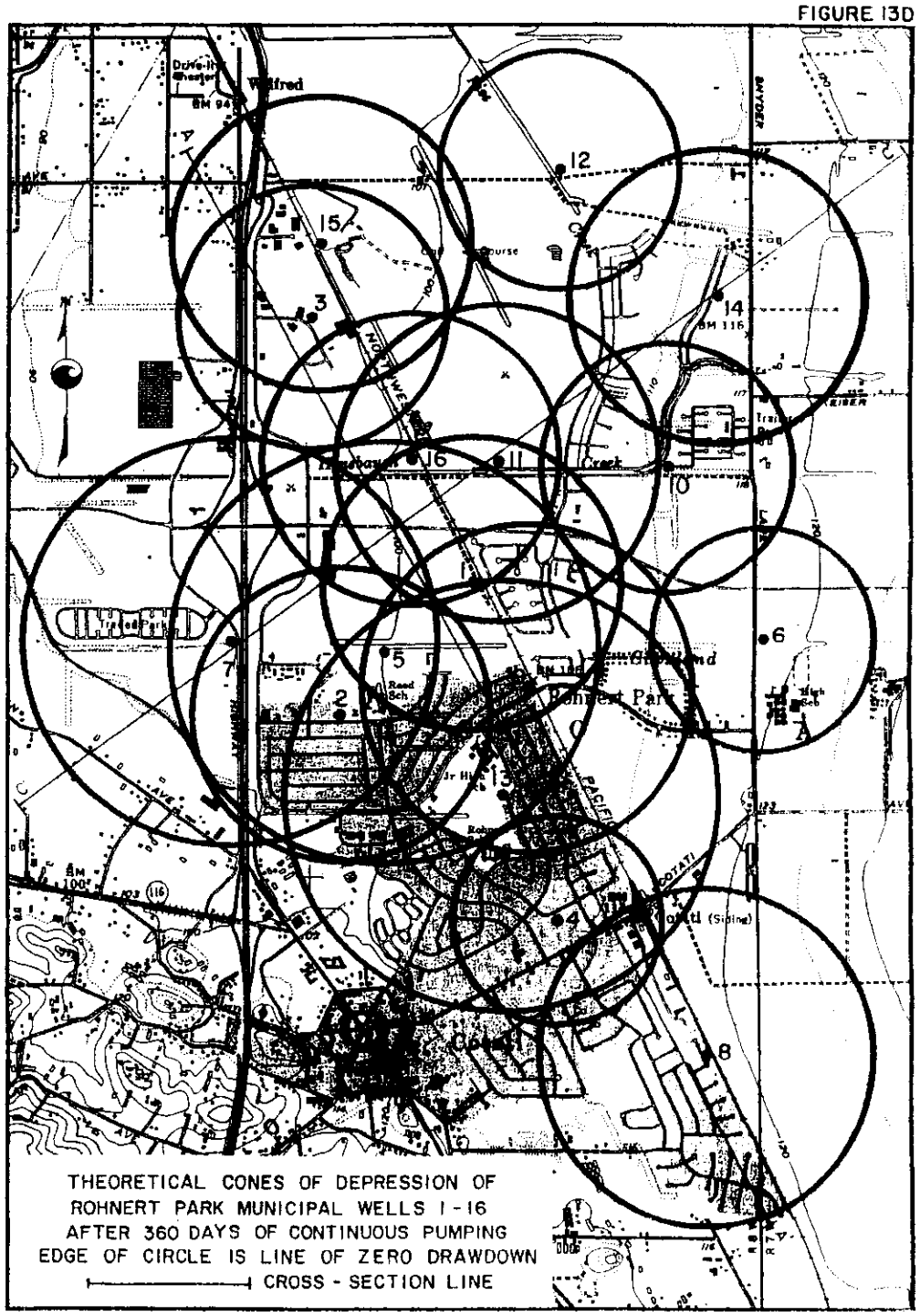
FIGURE 13C



Cones of depression for 16 Rohnert Park municipal wells.

360 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

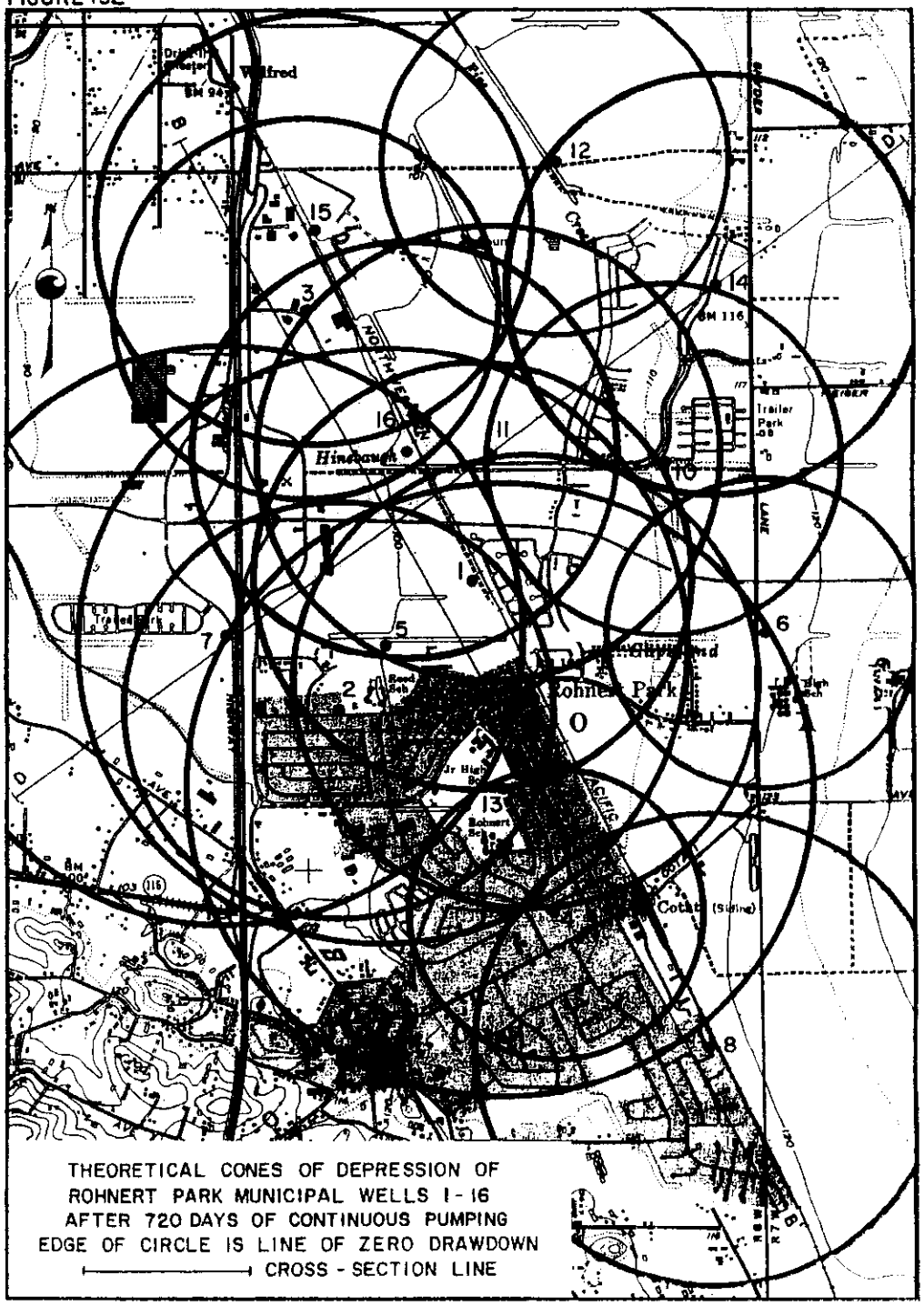


Cones of depression for 16 Rohnert Park municipal wells.

720 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13E



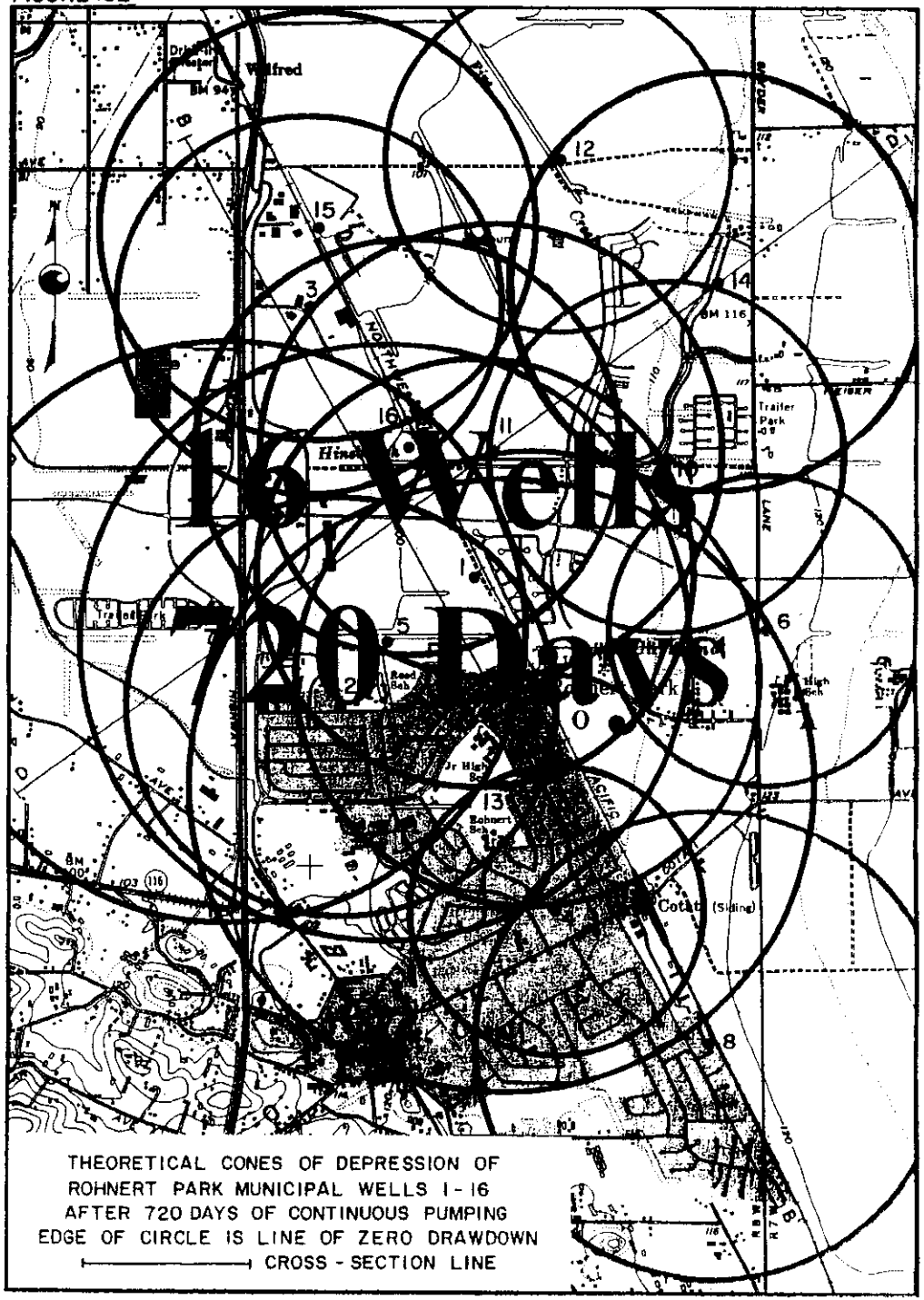
What is the impact of

42 Wells
9000 Days
since 1958

?

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13E



MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

California Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812

re: OLF Cotati, Sonoma County, CA

Dear Sirs:

Enclosed you will find a copy of my letter to the U.S. Army Corps of Engineers regarding the formerly used defense site know as Outer Landing Field, Cotati. This base was used during W.W. II. It has been identified by USACE as being eligible for the clean-up program and its status is active.

The reports list "at least one 1000 gallon" underground gas/oil storage tank, as well as a gas distribution system, possible buried ordinance, and possible oil waste. I live approximately 500 yards from this facility, and I am concerned that no clean-up work is planned because of budget constraints.

I am also concerned by what the reports do *not* address. I am concerned that USACE has no mitigation planned for the contamination from the machine gun range, as I have reason to believe that the location of the firing range, which was also used until 1958 by the Sonoma County Peace Officers Association, is the current location of the Rancho Verde Mobile Home Park.

I am concerned that during and after the war, undocumented disposal of toxic substances may have been occurred on the Western perimeter of the base. It is a well-documented fact that such burials were routine after the war, and records either were not kept well, or not kept at all. Chemical weapons have been found buried on the perimeter of the Sonoma County Airport, which was the old Santa Rosa AAF base. This FUDS is considered highly contaminated.

Based on evidence I have in my possession, I have good reason to believe that the Western perimeter of the base was used for waste and refuse pits. It is of great importance that the possibility of burial pits for refuse and/or toxic waste be fully explored on the OLF Cotati site.

No mention is made in the USACE reports about soil and/or water testing. Therefore, it is of utmost urgency that your agency take immediate action to ensure that this site and the land surrounding it is fully studied. The site is heavily frequented by people, and even the undeveloped land is easily accessible. The property 200 to 500 yards outside the boundaries of the airstrip itself are in imminent danger of development, and there has been recent development on the site itself. Local residents rely on well water as their sole source of domestic water, and

the UG tank and/or other possible contaminants in the water supply and the soil may pose a hazard to human health in this area.

Your prompt attention to this matter will be very much appreciated. If you have any questions, or if I can be of any assistance at all, please feel free to call me at 707-588-9926.

Very truly yours,

Marilee Taylor Montgomery

/mtm
cc

OUTER LANDING FIELD - COTATI

Prepared by Marilee Montgomery

February 22, 2004

HISTORY: In 1943-44, the U.S. Navy bought land in what was then known as Cotati, as a satellite airfield for the Alameda NAS. The Site Survey Summary Sheet for DERP-FUDS Site No. J09CA7470, dated September, 1999, indicates that there were two parcels of land for this site: a 218.25 acre parcel located in what is now Rohnert Park, and which has been developed over the years for commercial and residential purposes, and a 74.85 acre parcel, the exact location of which is currently unknown. This 74.85 acres is mentioned several times in various USACE reports, memoranda, and reference lists.

According to a 1944 General Layout Map of the Cotati Air Facility, the site contained two runways, a control tower, fire and crash truck building, gasoline and oil storage, a small arms magazine and a machine gun range. Other sources of historical reference indicate there were also barracks on the property, and there was at least one underground (UG) storage tank. The 1944 U.S. Army/Navy Directory of Airfields described the landing field of the "Cotati OLF, Navy" as having two runways, with the largest being 4,000 feet long.

The types of planes and/or the operations conducted at this airfield during W.W.II are unknown, however, OLF Cotati had a Tower, something which was only built on busy airfields. One aviation historian has suggested that in all probability, there were hundreds of planes using this field every day. This is a reasonable estimate, since the building of OLF Cotati coincides with the build-up in the Pacific Theater.

As late as 1948, the Cotati OLF was still depicted on Sacramento Sectional Charts as an active Navy Field. In 1949, the same chart listed it as "Cotati (Navy)", although a memorandum from the commander of Naval Air Bases, 11th and 12th Naval District, stated the status of the Cotati OLF as "inactive", with some land being leased for agricultural purposes, and the old machine gun range being used by Sonoma County Peace Officer's Association under a permit from the federal government.

The field was declared excess in 1956. From 1957-58, Standard Oil's California Research Corporation licensed the facility from the government for fuel testing purposes. Another lease permitted the City of Santa Rosa to use the airfield for drag racing. Local oral tradition has drag racing occurring there as early as 1952.

In the 1950's, there was some use of the airstrip for civilian planes. The property was conveyed by the federal government to a private party in 1958.

THE FUDS PROGRAM: In 1983, the government, under the auspices of the U.S. Army, began a process of identifying what are known as Formerly Used Defense Sites (FUDS), for the purpose of evaluating possible toxic waste contamination of these sites and determining their eligibility for cleanup using the Department of Defense guidelines established for closing military installations.

To date, more than 9,000 potential FUDS have been identified. More than 90% have been evaluated for FUDS program eligibility. Only 30% of the eligible sites require further response action. The remaining 70% do not require further action. Of the 30% that require more action, over 4,000 sites have been identified. FUDS properties include sites with contaminants ranging from industrial waste such as fuels and cleaning solvents in

groundwater, those with ordnance and explosives, and those requiring building demolition and debris removal, including asbestos remediation.

These hazards are given the following classifications:

1. *Building Demolition and Debris Removal Projects:* Requires that conditions were inherently hazardous when the property was disposed of or transferred and these conditions must present a clear danger.

2. *Hazardous, Toxic and Radioactive Waste Projects:* Includes environmental response actions related to hazardous substances, pollutants and contaminants which conform to the requirements of the National Contingency Plan of CERCLA.

3. *Containerized Hazardous, Toxic and Radioactive Waste Projects:* Differs from hazardous, toxic and radioactive waste projects in that they are classified as short-term corrective actions as opposed to long-term corrective actions. Includes but is not limited to the following: underground storage tanks, aboveground storage tanks, transformers, hydraulic systems, investigative derived wastes, abandoning of inactive monitoring wells, etc.

4. *Ordinance and Explosive Waste Projects:* Includes environmental response actions for all forms of military munitions and chemical warfare material.

5. *Potentially Responsible Party, Including Third-Party Sites:* Includes projects where the Department of Defense may share potential CERCLA responsibility for the hazardous condition.

CURRENT STATUS OF SITE: According to the U.S. Army Corps of Engineers (USACE), Sacramento Division, the Outer Landing Field (OLF) Cotati was identified as a FUDS as early as 1996, and perhaps earlier. In 1999, the base was determined to be eligible for the FUDS mitigation program and was given the property number of J09CA7470. It's status is "active".

A Site Survey was conducted on June 11, 1999, by Betty Henkle and Steve Cowen of TechLaw, the company hired by the DoD to assess the property. They met with Hugh Codding, of Codding Enterprises, at the 218.25 acre site. When asked by the team, Mr. Codding denied any knowledge of a UG tank or tanks, or any ordinance being found. The team recommended, among other things, that ground radar be used to locate the tank(s), which the Army indicates is visible in an early aerial photograph, and that the surrounding soil be tested.

Three to four projects as defined by the Department of Defense ("DoD") have been identified on this site. Information obtained from the Government Accounting Office ("GAO") lists the site four times, with each listing carrying its own description of the hazards at the site: CON/HTRW (listed twice), HTRW, and OEW-R, which translate respectively to, "Containerized Hazardous, Toxic and Radioactive Waste" (CON/HTRW), "Hazardous, Toxic, Radioactive Waste" (HTRW), and "Ordinance and Explosive Waste" (OEW-R). No soil and/or water testing or remediation has been done, and according to USACE, Sacramento, there are no funds available for this project.

USACE and GAO records indicate that OLF Cotati has been declared a hazardous site which may pose a health hazard for humans; that no remediation has been performed to date; that no testing of soil or water has been done to date; that no effort has been made to locate the underground (UG) airplane fuel and/or oil tank (s) known to have been on the site; that no effort has been made to locate rubbish and/or waste and/or surplus

material burial sites; that no effort has been made to clean up the heavily contaminated firing range known to be on the site, including the phosphorus from machine gun tracer rounds; that no effort has been made to locate the UG fuel distribution system know to be on the site; and that no testing for additional known military toxic contaminants has been done.

POSSIBLE CONTAMINANTS ON THE OLF COTATI SITE:

1. **LEAD:** Lead is a high-density, toxic material that is difficult to dispose of safely. There is no known "safe" level of lead exposure for children. Complex geochemical processes affect lead mobility in soil. Metallic lead is not inert in the environment, and can be oxidized to more soluble forms. These forms determine the mobility of the lead at shooting ranges. The rate of oxidation and the type of the resultant products are highly variable and are site specific.

Once oxidized, lead can be precipitate in the form of hydroxides, sulfates, carbonates, and phosphates. Each one of these is soluble, and the solubility is controlled in large part by the site-specific water chemistry to which they are exposed. Acidic conditions will also result in substantial mobility. Complexation/chelation and transport of particulates that contain lead are complication factors that may have the effect of increasing the physical movement of lead.

In general, lead is much more soluble under acidic pH, and rainwater is generally acidic. It is important to bear in mind that the site in question is an area of Vernal Wetlands, with much of it under rainwater and/or saturated with rainwater for three to six months of the year, depending on the amount of rainfall and the length of the rainy season.

Note: simple measurements of lead concentrations in soil and sediment do not provide an accurate assessment of lead bioavailability or mobility.

LEAD FROM MACHINE GUN RANGE: Issues surrounding lead contamination at shooting ranges are well documented and include the mobility of the lead in surface water or groundwater and in soil. Firing ranges are considered to be the major source of lead contamination in this country. Throughout the United States, lead from outdoor shooting ranges is known to leach out, contaminating soil and groundwater. Many outdoor ranges have been forced to close as a result. The contaminated soil from these ranges has to be removed at great expense and disposed of as hazardous waste.

At the time during which the Cotati OLF shooting range was in use, a period of roughly fifteen years, ammunition was produced from materials containing lead; most ammunition is still produced in this manner. Using such ammunition in target practice leads to lead contamination issues.

Shooting ranges produce lead contamination of the soil in two ways: airborne and spent rounds. Spent rounds are mostly found in the earthen berms of a shooting range. The bullets behave in several ways when they strike the berm, including penetrating, agglomerating, smearing, and ricocheting. While most of the lead in these berms is intact bullets and large fragments, the very small particles of lead and lead compounds that are produced from the weathering of the particles is the source of most lead mobility.

The other source contamination is airborne lead, which, when released, falls to the earth. Airborne lead is produced in three ways: (1) conventional primers use a lead based material which, when ignited, releases lead into the air at the firing line. (2) when conventional leaded ammunition is fired, lead is vaporized from the end of the projectile, releasing more lead into the air. (3) when the projectile hits the berm, lead is released into the air. All of this airborne lead then falls to the ground, thus the contamination is not only at the berm, but also at the firing line and points in between. These airborne particles are quite minute, and as such, are more soluble than the larger particles of lead from bullet fragments.

It is unknown how many pounds of lead were deposited during the period the base was occupied by the military, or later, by the Sonoma County Peace Officers Association, however, some rough estimates may be made using some known facts. In a study done by David H. Edwards of Virginia Polytechnic Institute, the gross lead amount at the U.S. Forest Service Shooting Range in the Shenandoah National Forest was at least 90,000 pounds per year from the one to three million rounds fired per year. It is reasonable to expect that the use of the Cotati OLF shooting range by the Sonoma County Peace Officers Association produced a comparable amount of lead from spent rounds.

With regard to the machine gun range during W.W. II, a W.W.II-era machine gun was capable of firing from 500 to over 1,200 rounds per minute, depending on what type of weapon was being used. ***Every third round was a tracer round containing phosphorus.*** The volume of rounds fired could have resulted in excess of 1,000,000 pounds of lead per year from the machine gun range during the war era. Even limited use of a machine gun range can produce a high amount of lead deposit. For example, using the U.S. Forest Service model above, 3 million rounds = 90,000 pounds of lead, the following estimates can be determined:

1) 500 rpm x 4 hours per day =
   120,000 rounds per day x 200 days per year =
   24,000,000 rounds per year = 720,000 pounds of lead per year

2) 1200 rpm x 4 hours per day =
   288,000 rounds per day x 200 days per year =
   57,600,000 rounds per year = 1,728,000 pounds of lead per year

These estimates are extremely conservative. Nevertheless, even a limited use of the range by the military would have resulted in millions of pounds of lead over the two years that the base was active. Taken into consideration with the fact that the range was used by the Sonoma County Peace Officers Association for approximately ten years after the war ended, clearly, there is an urgent situation with regard to lead contamination at this site.

Note: According to Sgt. Gerald E. Vincent of the U.S. Army Corps of Engineers, Sacramento Division, records indicate that the machine gun range was located where the Rancho Verde Mobile Park is situated today. It is unknown what was done with the soil from the earthen berm and the earth of the shooting range in general.

LEAD FROM AIRPLANE AND/OR AUTOMOBILE FUEL: Tetraethyl lead additives to gasoline are highly toxic. This compound generally degrades in soil within a matter of months, so any organic lead currently in the soil is most likely in the form of mineralized ethyl lead breakdown products of tetraethyl lead. The toxicity of

these compounds is not known. Exposure to organic lead in surface soil presents a known public health hazard. High levels of organic lead have been identified at military airbases.

Apparently, aviation fuel and gasoline and/or diesel fuel was stored both above-ground and underground at this site. The condition or disposition of the storage tanks is unknown. It is unknown how many planes used the field each day, and how much airplane fuel and oil was stored at the facility. It is unknown how much leaded airplane fuel may have contaminated the grounds from plane crashes, fire drills, and fuel spills and/or dumping, nor is it known where such disposal, fire drills or accidental spillage may have taken place on the site.

It is unknown how the facility was used by the California Research Corporation, specifically, if automobiles crashed on the site, if fuel spills were released, or if fuel was disposed of at the site or if fuel was stored on site either underground or on the surface, nor is it known where such disposal, storage, or accidental spillage may have taken place on the site. California Research Corporation at that time engaged in, among other things, petroleum processing research; the company is now owned by Chevron. If gasoline with experimental additives were tested at the Cotati OLF site, it is not known what substances these fuels might have contained.

The same is true with the airfield's drag-racing era; the amount of contamination of the soil from crashes and re-fueling spills and/or disposal of fuel, oil, etc., and the location of same is unknown.

LEAD FROM LEAD-BASED PAINTS: It is unknown what contamination during the forties may have resulted from the common use of lead-based paint on military installations. It is possible that the ground itself may have been painted as camouflage, since this was done at some military airstrips during W.W.II. It is not known where any painting, disposal of paint, or accidental spillage of paint may have taken place on the site.

LEAD FROM DISCARDED BATTERIES: It is unknown what contamination may have resulted from indiscriminate and improper disposal of aircraft, automobile, and/or equipment batteries, nor is it known where any disposal of these items may have taken place on the site.

STUDIES OF LEAD CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF LEAD CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

2) CONTAMINANTS OTHER THAN LEAD:

CONTAMINANTS FROM AVIATION GASOLINE OTHER THAN LEAD: Known toxic contaminants of aviation gasoline include Toluene (Methylbenzene), which is toxic by ingestion, inhalation and skin absorption.

OTHER POSSIBLE CONTAMINANTS: Other possible contaminants might include, but are not limited to, the following: Chlorobenzene (Phenylchloride), found in Phenol, solvents, and pesticides; Lindane, an insecticide and fumigant; antifreeze, a poison; battery acid; diesel fuel, a toxin; kerosene; waste oil and spilled oil; paint solvents and thinners; arsenic, found in lead and copper shot and battery grids; selenium, found in relays, steel and copper, and as a vulcanizing agent for rubber. barium, found in vacuum tubes, copper, and spark plug alloys; cadmium, from electrodeposited and dipped coatings on metals, and in alloys and machinery enamels;

mercury, from thermometers, electrical apparatus, and mirror coating; silver, from electrical conductors, electrical contacts, and magnet windings; asbestos, widely used as insulation; fuel filters; oil filters; phosphorus from machine gun tracer rounds. It is unknown how many of these contaminents were present on the base.

BURIAL OF RUBBISH, WASTES, AND/OR SURPLUS MATERIAL AT THE SITE: It is unknown where the base's dump site was, although an aerial photograph of the site seems to indicate numerous "ground scars" marking the location of rather large burial pits, some of them connected by pathways. These ground scars are located just on the other side of the drainage ditch that borders the Rancho Verde Mobile Home Park on the West. A common-sense evaluation of the situation would suggest that this was the most probable location of any dump site(s) for the base, as it is unlikely that such disposal efforts would have taken place at the Eastern end of the base where the tower, access roads and out-buildings were located. It is possible that the 74.85 acres mentioned in military records may have included the property west of the mobile home park, and further study of that area is indicated.

It was also common practice during W.W. II for the military to dig "dry wells", eight to ten inches in diameter, in which they would dump all their solvents, oil, paint, paint thinners, etc. These would have been capped over with soil when they were full, or when the base was closed. The location of these dry wells, if any, are unknown.

At the end of W.W. II, chemical and other weapons and toxic material were routinely buried wherever the military had men, bases, camps, etc. Records of such burials were either poorly kept or not kept at all. The old Santa Rosa AAF base, now the site of the Sonoma County Airport, is heavily contaminated as a result of such activities; Lewiston and other toxic agents have been found buried at the site, and there is no record of these burials. We must ask ourselves if USACE taken all possible measures to ensure there were no surplus, potentially toxic material buried on or near the OLF Cotati site at the end of W.W. II.
It is unknown what contaminents might have been buried as part of the normal disposal protocol of that era, and it unknown where such burials may have taken place.

STUDIES OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

TOXICS TRAVEL: It is now a known fact that toxic waste contamination "travels" to the surrounding land and water sources. Without adequate disposal methods, the heavy metals, petroleum products, and distillates, etc., produced by this military installation were most likely emitted directly into the air, soil and water of the surrounding area. Current knowledge of the movement of toxic contaminants indicate that an area of up to 500 yards surrounding this FUDS may be contaminated, and extensive testing needs to be conducted at least within a five hundred yard radius to determine the extent of the contamination.

There is great potential for water contamination, complicated by the fact that the direction in which water moves is determined by underground structures, not the slope of the land. This would necessitate extensive off-site and

on site water tests. This is especially crucial as surrounding homes use wells as their only source of water. The Army should test all wells in the area, whether those wells are privately or publicly owned.

The UG tank or tanks need to located, and their condition needs to be determined. Given that the material used for the tank(s) was probably steel, we can reasonably assume that the tanks have deteriorated, and may have sent plumes of contaminants throughout the site and the surrounding land.

The land on which Rancho Verde Mobile Home Park sits is the site of the machine gun range, later used as a firing range by the Sonoma County Peace Officer's Association. This location must be considered heavily contaminated with lead and phosphorus. USACE must be required to conduct extensive soil and water tests on the site itself and the surrounding property at least up to 500 yards of the site.

The exact location of burial pits and/or dry wells used by this facility for disposal of waste material must be identified, and once found, those sites must be tested.

IMPACT OF TOXIC WASTE CONTAMINATION ON PROPOSED AND EXISTING DEVELOPMENT: According to The Army Times, tracking down the sources of toxic contamination and determining past waste-management practices (in the military) requires "...the patience of a historian, the skill of a detective, and the tenacity of a treasure hunter....". In the absence of any real, hard data from the DoD regarding the level of pollution at this site, it must be assumed at this point that the 218.25 acres of the airstrip itself and the unidentified 74.85 acres, as well as the surrounding land up to 500 yards are heavily contaminated from its use as a military installation, and the additional contamination from the use of the firing range by the Sonoma County Peace Officers Association.

There is a long time-lag between the dumping of a toxin and groundwater contamination, identification of a specific health issue, and an eventual study of the causal links to a toxic site. The effect of exposure to low levels of chemicals leaking into the air, soil and water from toxic waste sites has not been adequately studied.

The site in question was not extensively developed until the 1980's, long after this country had increased its awareness of pollution from toxic waste contaminants. Assuming that the City of Rohnert Park possessed the common knowledge of the time, it should never have allowed development on this site. Certainly, no further development should have been permitted once the Army identified the site as hazardous in 1999. But further development has taken place since 1999, and in fact, it is taking place now. The former Crusher Stadium, only yards outside the base perimeter, is currently being developed, and this development threatens the health of the public, as dust and particulates from the excavation and grading process may contain contaminants. The lack of oversight by the City of Rohnert Park in this matter would seem to represent a wanton disregard for public safety.

Three multi-unit residential properties, consisting of two mobile home parks and one large apartment complex, are located on the 218.25 acre site itself, and there are single-family homes within 500 yards of the site. Rancho Verde Mobile Home Park is certainly the most obvious risk, however, the residents of all the homes on or adjacent to the base are in jeopardy.

The site is adjacent to a state designated groundwater recharge zone. It is a flood plain. Even the health of the Russian River and the Laguna de Santa Rosa could be at risk from the heavy metals and other known and unknown contaminants that may have resulted from this base.

A recent GAO report to Congress regarding the DoD's FUDS program was highly critical of the fact that the Army has consistently underestimated both the levels of contamination and the cost and time necessary for the remediation at these FUDS. Therefore, it can be assumed that the OLF Cotati site may well be more contaminated than the Army has indicated to date. The Army's tendency to underestimate the dangers at these sites and the cost to clean them up may be the reason that there is no plan to clean up the firing range, that no extensive soil and water testing has been conducted, and that to date, the study of the site has been cursory at best.

In addition, the hazard rating for this site was not computed correctly:

1) On Page 2 of the RAC Worksheet contained in the Final Inventory Project Report, it is logical to assume that at least some flares were kept at this facility, yet the rating for this item is shown as "0", instead of "4"

2) On Page 5 of the Worksheet, the number of buildings within a two mile radius is shown as "16 to 25", with a Value of "3". In 1999, when this report was done, there were - and still are - thousands of residential and commercial buildings within a two mile radius, as that radius includes virtually the entire town of Rohnert Park, as well as Rural Residential areas to the South, West and North of the site. On the site itself there are two mobile home parks, a large apartment complex and commercial structures, all of which existed in 1999. This Hazard Value should be rated a "5".

3) On Page 7 of the Worksheet,, under "Site Dynamics", again, the rating is inaccurately assessed; by 1999, not only had the site already had been developed further, more development on and/or adjacent to the site was anticipated. In fact at least one residential apartment project is in the works for that site. The rating should be a "5", not "0".

These ratings changes result in an overall Hazard Probability of "31", not "20", as computed by TechLaw, thereby increasing the Hazard Probability from a level 4 to level 2, at the least.

Not taken into account in this Hazard Probability rating is the lead from the firing range. This highly-toxic contaminant, which is known to pose a hazard to human health, makes the potential for toxic contamination on and around this site **EXTREME.**

SUMMARY: Although the Army may have underestimated the contamination at this site, this community should not make the same mistake. This entire area and the surrounding property up to at least 500 yards should be considered contaminated. It is of extreme importance that measures should be taken to restrict the public's access to the properties involved and to prevent any development or sale or transfer of the suspect lands until further, extensive testing is done by the DoD, and any toxic waste contamination has been thoroughly mitigated.

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

California Department of Toxic Substances Control
Attention: Site Mitigation & Brownfields Reuse Program
Post Office Box 806
Sacramento, CA 95812-0806

re: OLF Cotati, Sonoma County, CA

Dear Sirs:

Enclosed you will find a copy of my letter to the U.S. Army Corps of Engineers regarding the formerly used defense site know as Outer Landing Field, Cotati. This base was used during W.W. II. It has been identified by USACE as being eligible for the clean-up program and its status is active.

The reports list "at least one 1000 gallon" underground gas/oil storage tank, as well as a gas distribution system, possible buried ordinance, and possible oil waste. I live approximately 500 yards from this facility, and I am concerned that no clean-up work is planned because of budget constraints.

I am also concerned by what the reports do *not* address. I am concerned that USACE has no mitigation planned for the contamination from the machine gun range, as I have reason to believe that the location of the firing range, which was also used until 1958 by the Sonoma County Peace Officers Association, is the current location of the Rancho Verde Mobile Home Park.

I am concerned that during and after the war, undocumented disposal of toxic substances may have been occurred on the Western perimeter of the base. It is a well-documented fact that such burials were routine after the war, and records either were not kept well, or not kept at all. Chemical weapons have been found buried on the perimeter of the Sonoma County Airport, which was the old Santa Rosa AAF base. This FUDS is considered highly contaminated.

Based on evidence I have in my possession, I have good reason to believe that the Western perimeter of the base was used for waste and refuse pits. It is of great importance that the possibility of burial pits for refuse and/or toxic waste be fully explored on the OLF Cotati site.

It is of utmost urgency that your agency take immediate action to ensure that this site and the land surrounding it is fully studied. The site is heavily frequented by people, and even the undeveloped land is easily accessible. The property 200 to 500 yards outside the boundaries of the airstrip itself are in imminent danger of development, and there has been recent development on the site itself. Local residents rely on well water as their sole source of domestic water, and

the UG tank and/or other possible contaminants in the water supply and the soil may pose a hazard to human health in this area.

Your prompt attention to this matter will be very much appreciated. If you have any questions, or if I can be of any assistance at all, please feel free to call me at 707-588-9926.

Very truly yours,

Marilee Taylor Montgomery

/mtm
cc

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

Us Army Corps of Engineers, Sacramento Division
1325 J Street
Sacramento, CA 95814

re: Property Number J09CA7470/Cotati OLF, Sonoma County, CA

Dear Sirs:

I am writing in regard to the FUDS known as OLF Cotati, located in what is now Rohnert Park, CA. I have received some information under the FOI Act, and I have some further questions about the site as follows:

1) Where was the base's rubbish/waste burial site?
2) Why is no mention made in the reports about burial pits or wells used for the waste and refuse generated by the base?
3) Why is there no remediation plan for the lead contamination from the firing range?
4) Have residents within 500 yards of the site been notified of the hazardous conditions, and if so, when and how?
5) Has the County been notified of this hazard and if so, when and how?
6) Has the City of Rohnert Park been notified of this hazard, and if so, when and how?
7) Have the current owners of the base site and the properties surrounding it been notified of the hazard, and if so, when and how?
8) Has the Sonoma County Regional Water Quality Control Board been notified of this hazard, and if so, when and how?
9) Does USACE plan to locate the missing 74 acres mentioned in the documents?
10) Is there potentially more than one underground oil/gasoline storage tank on the property?
11) When will clean-up of this site begin?
12) What will the cost of clean-up be?
13) Is USACE aware that the properties immediately adjacent to and within 500 yards of the base's perimeters are under imminent threat of development? What notice will be provided to the owners of those properties regarding the hazards associated with this site?
14) Is USACE aware that further development of the base site has taken place since 1999?
15) With the existence of at least one UG oil/gasoline storage tank and a firing range, and with the fact that there are residences on and immediately adjacent to this property, as well as the widespread use of well-water as the primary source for domestic water in many of the residences surrounding this site, why hasn't USACE upgraded the hazard to the public from this site from level 4 to a higher level?
16) Has USACE advised the State of California Department of Toxic Substances with regard to this site, and if so, when and how?
17) Have residents of Rancho Verde Mobile Home Park been advised of the lead hazard, and if so, when and how?

18) At the end of W.W. II, chemical and other weapons and toxic material were buried throughout the Santa Rosa AAF base now the site of the Sonoma County Airport. Such burials from this era were common and usually went unrecorded, as is the case at the Santa Rosa facility, where Lewiston and other toxic agents have been found. Has the USACE taken all possible measures to ensure there were no surplus, potentially toxic material buried on or near the OLF Cotati site at the end of W.W. II? If it has, what measures were taken, and what were the results?

19) Were any studies done regarding asbestos at this site, and if so, what were the results?

20) Were any studies performed for the following known toxic contaminants : aviation gasoline including Toluene (Methylbenzene); Chlorobenzene (Phenylchloride); Lindane; antifreeze; battery acid; diesel fuel; kerosene; waste oil and spilled oil; paint solvents and thinners; arsenic from lead and/or battery grids; selenium from relays, steel and copper, and vulcanized rubber; barium from vacuum tubes, copper, and spark plug alloys; cadmium from electrodeposited and dipped coatings on metals, and in alloys and machinery enamels; mercury, from thermometers, electrical apparatus, and mirror coating; silver, from electrical conductors, electrical contacts, and magnet windings; fuel filters; oil filters; phosphorus from tracer rounds; if so, what were the results?

21) How and where were such materials as listed in the questions above normally disposed of on the base?

22) Have soil and/or water samples been conducted both at the aristrip site itself and/or the surrounding area within 500 yards? If so, when were the tests conducted, and what were the results?

23) With regard to the matter of gas and/or oil underground tanks and/or gasoline distribution system, has a survey been conducted of the location(s) of any UG tanks, and if so, when, and what were the results? If such a survey has been conducted, and if the UG tank(s) have been located, what is the condition of the tank(s)?

As a resident of the area who lives within 500 yards of this FUDS, I am understandably concerned about the potential for contaminants in the soil and in my well water, especially in light of the GAO's recent report, which indicated that the DoD has consistently underestimated both the number and severity of toxic waste contamination at such sites, as well as the cost to remedy them. I would therefore appreciate a prompt response.

Thank you in advance for your anticipated cooperation. Should you have any questions, or if I can be of any assistance to you, please feel to contact me at 707-588-9926. After 2:00 p.m. is best.

Very truly yours,

Marilee Taylor Montgomery

/mtm

cc: California Department of Toxic Substances
California Water Resources Control Board

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

O.W.L. Foundation policy statement prepared by Ed Casey and Paeter Garcia,
Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, 16th Floor, Los Angeles, CA 90071 tel. (213) 576-1000

I. INTRODUCTION

An extremely large development project (Indian casino and hotel/retail center) is slated for an identified region of Sonoma County where groundwater supplies are already being critically overdrafted. *Clearly, a sufficient and sustainable water supply does not exist for the project*, particularly in light of the region's prevailing water crisis and the current and future water needs of local residents. For that reason alone, the project should not be allowed to proceed. However, the Casino project's sovereign status would make matters even worse. For instance, the project may seek to ignore state environmental protection laws and local water management efforts and, in the event of groundwater litigation, the project could unjustly obtain priority over longstanding water rights held and relied upon by local landowners, cities, water agencies, and the County.

For these and other reasons discussed below, the O.W.L. Foundation (Open Space, Water Resource Protection, Land Use) ("O.W.L.") urges that the Casino project should be denied.

II. BACKGROUND

O.W.L. is a non-profit organization headquartered in the community of Penngrove, Sonoma County, California. O.W.L.'s membership is comprised of residents throughout Sonoma County, including residents of Penngrove, who understand that immediate steps must be taken to avoid a disastrous outcome for one of their County's most precious resources – water – groundwater in particular.

Penngrove is situated in the valley floor west of the Sonoma Mountains, roughly between the City of Rohnert Park, to the North, and the City of Petaluma, to the South. Like many communities of Sonoma County, Penngrove has historically relied on local groundwater, including the Santa Rosa Plain Groundwater Basin, to provide a reliable water supply for its residents and agricultural industry. (See Attachment A.) However, in connection with the last two decades of increased urbanization in Sonoma County, that once reliable groundwater supply has been drastically overproduced and woefully undermanaged. In fact, federal, state, and local water agencies have all found that Sonoma County's groundwater resources are in serious jeopardy. Surface water supplies available to the County are equally strained, and a recent Court of Appeal decision confirmed that Sonoma County's water supply problem extends far beyond any quick-fix.

Notwithstanding this undeniable state of affairs, which could easily result in a complete public fiasco, the Sonoma County Water Agency, the County Board of Supervisors, and various municipalities have turned a blind eye to the County's water crisis and have determined to proceed with a host of new projects – including the Casino project – *without* being able to demonstrate that a sufficient, reliable, and sustainable water supply exists for those projects in light of the County's current and future water needs. (See pp. 12-13, below, regarding the proposed Casino project.)

III. WATER RESOURCE MANAGEMENT IS A PUBLIC RESPONSIBILITY

O.W.L. has stepped in and asked these public agencies to take a hard look at the consequences of their actions. For years, O.W.L. members have attended town hall forums, commission meetings, and city council hearings to voice their concerns about the looming water scarcity and about the impacts that local decision-making has on Countywide water resource management. O.W.L. has consistently presented an abundant variety of undisputable facts about existing and worsening conditions of groundwater basin overdraft and overall County water supply. (The entirety of reports, charts, maps, diagrams, and other relevant water supply information submitted by O.W.L. are not included with this letter, yet copies of that information can be provided upon request.)

A. Existing Groundwater Overdraft Must be Addressed and Resolved

1. Basin Overdraft is a Serious Problem

Groundwater basin overdraft occurs when the rate at which groundwater is produced from a basin exceeds the average annual amount by which the basin is replenished by rainfall and percolation from other natural water sources. Overdraft is often defined as the condition resulting from the continual lowering of the level and gradual reducing of the total amount of stored water, the accumulated effect of which, after a period of years, renders the supply insufficient to meet the needs of the public. Prolonged overdraft can cause numerous long-term detrimental economic and environmental impacts. When a groundwater basin is in overdraft, groundwater users must often deepen their wells and install more powerful pumps to extract a sufficient supply of water from ever-greater depths of the basin. To that end, overdraft can also result in land subsidence, loss of surface vegetation and wetlands habitat, and severe degradation of groundwater quality. Perhaps most notably, however, overdraft causes injury to existing water rights and often leads to complicated and protracted litigation to adjudicate a basin's water supply.

2. Areas of Natural Recharge Must Be Protected

Groundwater overdraft can be corrected by taking steps to replenish a depleted basin and protect areas of natural recharge. For the most part, groundwater basins are recharged by natural percolation, where rainfall and other waters are allowed to collect and percolate down into the basin. This process typically occurs through stream beds or areas of open space with porous soil know as "areas of natural recharge." When areas of natural recharge are developed and covered by buildings, streets, sidewalks, and other non-permeable surfaces, natural basin replenishment cannot occur and groundwater overdraft is exacerbated. Once the recharge areas are gone, they cannot be replaced.

3. O.W.L. has Shown that Severe Overdraft Exists in the County and that Areas of Natural Recharge are Being Lost at an Alarming Rate

O.W.L. members have used publicly available information to show the County, the County Water Agency, and local municipalities that the Santa Rosa Plain Groundwater Basin and other adjoining groundwater basins are seriously overdrafted and further threatened by the continual loss of areas of natural recharge.

With regard to overdraft, O.W.L. has pointed to reports prepared by these agencies' own consultants to show the extent of the County's groundwater crisis. For example, in the southern portion of the Santa Rosa Plain Groundwater Basin encompassing the cities of Rohnert Park, Cotati, and northern Penngrove (Attachment B), annual recharge is approximately 1.6 million gallons per day ("mgd"), yet annual production in that area exceeds 5.0 mgd. This drastic overdraft of the basin has caused local groundwater levels to drop by as much as 150 feet. (See Attachments B and C.)

Indeed, in 2002, the Sonoma County Water Agency pumped 5.4 mgd from three nearby "emergency wells" (enough to supply about 30,000 urban customers) even though the Agency has not declared that any emergency exists. Even worse, the Agency produces this groundwater from rural areas of Sonoma County and sells and exports a substantial portion of that water to fuel urban growth in Marin County. As a result, rural Sonoma County residents near Sebastopol are beginning to voice concerns that numerous recent dry wells in their area are being caused by the Agency's excessive pumping from the "emergency wells."

Information published by the State Department of Water Resources ("DWR") clearly supports the conclusion that the region has fallen into serious overdraft. DWR indicates that the annual rate of groundwater production in the Santa Rosa Plain between 1960 and 1975 was *barely* in balance with the rate of groundwater replenishment for that same period (which is consistent with the City of Rohnert Park's EIR assessment for its General Plan, above; See Attachment C, Figure 4.10-2.) Similarly, as early as 1972, the United Stated Geological Survey ("USGS") characterized the majority of the Sonoma County groundwater basin complex as "marginal" or "inadequate" for municipal uses. However, by 1999, the City of Rohnert Park had increased its groundwater production to an annual average of 4.3 mgd in the Santa Rosa Plain Groundwater Basin, while recharge remained unchanged at an average 1.6 mgd. (See Attachments B and C.) Moreover, in 2002, the Sonoma County Water Agency increased groundwater pumping in the same region from zero to 5.4 mgd.

Equally telling, the U.S. Department of the Interior ("DOI") recently published a map in May 2003 of the Western United States entitled "Potential Water Supply Crises by 2025." The map identifies areas were "existing supplies are not

adequate to meet water demands for people, for farms, and for the environment." The DOI concludes that Sonoma County has a "substantial conflict potential" over water supplies and ranks the County's water resource crisis in the same category as the Klamath Basin, where farmers, tribes, and the federal and state government are locked in a bitter feud over limited water supplies and competing water rights.

With regard to areas of natural recharge, O.W.L. has pointed to maps prepared by DWR and USGS which specifically designate various lands in Sonoma County as being critical to groundwater recharge. The Sonoma County Planning Department uses these same maps to describe such lands as dedicated "areas of natural recharge." (See Attachment D.) The bed of the Russian River is also a key source of groundwater recharge for the County. Notably, DWR recently issued the following statement as number 4 on its list of 10 "Major Recommendations" in its 2003 Bulletin 118 Update:

- Groundwater management agencies should work with land use agencies to inform them of the potential impacts various land use decisions may have on groundwater, and to identify, prioritize, and protect recharge areas.
- Local planners should consider recharge areas when making land use decisions that could reduce recharge or pose a risk to groundwater quality.
- Recharge areas should be identified and protected from land uses that limit recharge rates; such as paving or lining of channels.
- Both local water agencies and local governments should pursue education and outreach to inform the public of the location and importance of recharge areas.

O.W.L. advocates for responsible growth and adheres to the simple proposition that development and transformation of dedicated recharge lands prevents basin replenishment and substantially limits the amount of groundwater supply available for residents' existing and future needs.

B. A Key Community Group Successfully Litigated Against the City of Rohnert Park for the City's Failure to Adequately Assess Groundwater Impacts

A key community group (which evolved into O.W.L.) first stood ground in 2002 when it filed a lawsuit against the City of Rohnert Park for violating the California Environmental Quality Act ("CEQA") through its failure to adequately analyze the impacts that City's General Plan Update would have on groundwater resources. The lawsuit resulted in a stipulated judgment which restricts the City's land use approvals in relation to existing overdraft conditions. For instance, the Judgment requires that any CEQA document prepared by the City for a project located outside of its 1999 boundaries must include (1) a determination of the project's water demand, (2) an analysis of whether the total projected water supplies available to the City during normal, dry, and multi-dry years during a 20-year projection will meet the projected water demand associated with the project, and (3) an identification of the water supply that is proposed to serve the project. The City is also prohibited from approving any project outside its 1999 boundaries whose net consumptive water use impact on the City's water supply will contribute to the City exceeding an average annual groundwater pumping rate of 2.3 mgd (half of the City's mean pumping rate between 1984 and 1999.) Notably, even this amount of groundwater production is at odds with the City's own General Plan concept of "safe yield" which clearly recognizes that the groundwater subbasin is only replenished at the average rate of 1.6 mgd.

Further, the 2002 Judgment required the City to amend its sphere of influence to remove 170 acres of land within the Penngrove Specific Plan that were previously added to the City's sphere. The City had intended to re-zone those lands from one home per 20 acres (which would still permit natural groundwater recharge) to various new zoning designations that would allow high density residential, commercial, and industrial development (which would transform the open permeable soil to impermeable hardscape and prevent groundwater recharge).

C. O.W.L. Convinced Sonoma County Representatives to Include Key Water Management Objectives and Policies in the County's General Plan Update

In 2003, O.W.L. participated in the public review process conducted by a Sonoma County Citizens Advisory Committee ("CAC") to accept comments on and develop a draft "Water Resources Element" for the County's General Plan Update for the

year 2020. While that process is still underway, O.W.L. was instrumental in guiding the CAC to develop key policies and objectives that are protective of existing groundwater resources and recharge lands and aimed toward responsible management of water resources generally on a Countywide basis. Some of the more critical provisions of the Water Resources Element are:

- The general objective of using only sustainable water supplies to satisfy future growth.
- The general objective of protecting existing recharge areas.
- The policy of denying discretionary development applications if cumulative development will cause or exacerbate groundwater overdraft.
- The policy of requiring study of proposed development projects and their potential impact on overdraft, land subsidence, and saltwater intrusion.

IV. A SERIES OF RECENT DEVELOPMENTS HIGHLIGHT SONOMA COUNTY'S CONTINUING WATER CRISIS

Numerous recent developments illustrate that the water resource crisis in Sonoma County has finally come to a head.

A. The Eel River Decision

In a May 2003 decision, the First District Court of Appeal held that the Sonoma County Water Agency did not comply with CEQA and overturned an EIR that the Agency prepared for its Water Supply and Transmission System Project to divert additional water from the Russian River for distribution to Sonoma County cities and other water purveyors. The Court determined that the Agency failed to account for a possible loss of Russian River water that may occur if PG&E's pending application to divert less water from the Eel River for its hydroelectric power plant is granted by a federal agency. Since such water diverted from the Eel River, in turn, feeds into the Russian River, less water will be available in the Russian for the Agency to take and distribute if PG&E takes less water from the Eel River.

The Court of Appeal stated that "[Sonoma County Water Agency's] failure to consider the impact of the potential curtailment of water from the Eel River has resulted in an EIR that fails to alert decisionmakers and the public to the possibility that the Agency will not be able to supply water to its customers in an environmentally sound

way." As a result of the Eel River decision, the Agency's plans to divert additional surface water from the Russian River are indefinitely on hold.

B. The Sonoma County Water Agency Admits that it Does Not Have an Adequate 20-Year Supply

In response to the Eel River decision, the General Manager for the Sonoma County Water Agency issued a letter in August 2003 stating that water suppliers (including local municipalities) that have contracts to receive water from the Agency should not rely on the delivery estimates contained in the Agency's 2000 Urban Water Management Plan, which indicated that water supplies available to the Agency would be adequate over the next 20 years. Unfortunately, many of the local municipalities had already approved development projects and land use plans in reliance on the information contained in the 2000 Urban Water Management Plan. In light of requirements under California's new water supply laws (SB 221 and SB 610; *See discussion below*), the Agency also issued the following admonishment:

> "[M]anagers of all public water systems relying on water diverted under the Agency's water rights must work together with local planning agencies to determine the extent to which additional supplies are available to each system for proposed new developments, given existing demand, existing approved development, the water remaining under the Agency's 75,000 afy limit and other supplies that each public water supplier may have available." [The Agency's delivery estimates before the Eel River decision were set in excess of 100,000 afy.]

The Agency also recommended that each water purveyor take certain steps to provide a meaningful assessment and monitoring of water demand, including: (1) immediately evaluate the expected future water demands for existing and approved development projects and provide the Agency and other Agency contractors with that information; (2) identify the source of water for those projects; and (3) evaluate the future water demands anticipated from proposed, but not yet approved, development projects.

Clearly, this admission by the largest surface water supplier in Sonoma County that it does not have a sufficient 20-year supply means that municipalities and water purveyors will look to increased groundwater production to serve the growth that

may have already been sanctioned under local general plan processes. However, as set forth above, that groundwater supply is already overdrafted.

C. The County of Sonoma Permit and Resource Management Department has Acknowledged Existing Groundwater Overdraft

In November 2002, the County's Permit and Resources Management Department ("PRMD") determined that unmitigated groundwater impacts would be caused by a particular development project proposed by the City of Rohnert Park. PRMD disapproved of the proposed project on three separate grounds, including:

- The water balance shows that this portion of the Santa Rosa Basin is in overdraft (recharge is estimated at 1900 afy, the City of Rohnert Park is removing 5,040 afy, and this project may remove as much as 193 afy).
- The estimated overdraft situation is confirmed by the City of Rohnert Park's General Plan 2000 which acknowledges a lowering of the water table in this area by 100 to 150 feet. (See Attachments B and C.)
- The Revised Rohnert Park General Plan speculation that the City will reduce its groundwater removal by up to 50% is unsupported by purchase contracts for more imported surface water.

These comments clearly illustrate the disharmonious relationship between the Eel River decision, the admission by Sonoma County Water Agency that available surface water supplies will be less than anticipated, and the looming trend by local municipalities to further rely on an already overdrafted groundwater supply.

D. The Kleinfelder Report

In September 2003, the "Kleinfelder Report" was issued. The Report was commissioned by the County Board of Supervisors and confirmed the long-foregone conclusion that particular study areas of the County's groundwater basin complex are experiencing serious water scarcity. The Kleinfelder Report concludes, in part, that "[a]dditional groundwater extraction is likely to increase the rate of overdraft and result in further decline of the groundwater levels. ... Levels will continue to drop as long as extraction exceeds recharge."

PRMD reported to the County Board of Supervisors that the findings in the Kleinfelder Report will need to be considered in connection with any new

discretionary applications in the study areas (e.g., subdivisions or use permits) because "at a minimum, the Report will constitute 'substantial evidence' under CEQA that a cumulative groundwater impact may exist ..."

V. VARIOUS WATER MANAGEMENT TOOLS ARE AVAILABLE TO ALLEVIATE THE COUNTY'S WATER CRISIS

While California does not have a statewide regulatory system for surface and groundwater management, various methods are available to protect and preserve those resources, including new water supply legislation, groundwater ordinances, and water management plans. If used properly, these tools can address and alleviate the water crisis in Sonoma County.

A. SB 221 and SB 610 Promote "Responsible Growth"

Effective since January 2002, California's water supply laws (commonly referred to as SB 221 and SB 610) impose strict requirements on certain development projects. Generally, projects subject to SB 221 and SB 610 are those containing 500 or more residential dwelling units, commercial or industrial projects that fall within certain size parameters, and projects that would have a water demand equivalent to a residential development project with 500 units or more.

In general, for any project subject to SB 221 and/or SB 610, the project cannot be approved unless the project proponent can provide verification from the local water purveyor that a sufficient water supply is available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand created by the project in addition to existing and planned future uses, including agricultural and industrial uses. Particularly relevant to Sonoma County, if the water supply for the proposed project includes groundwater, the purveyor must consider and analyze multiple factors concerning the condition of the supplying groundwater basin and its rights to extract such groundwater among other competing users.

B. Local Groundwater Ordinances Offer Solutions for Overdraft

Cities and counties in California have the authority to adopt groundwater ordinances pursuant to their police powers to protect the public, health, safety and welfare in areas that are not already regulated by the state. As California does not have a

uniform groundwater regulatory scheme, nearly half of its counties, and many cities, have adopted local groundwater ordinances.

The general intent of groundwater ordinances is to protect and preserve the viability of the existing groundwater supply. To that end, many groundwater ordinances focus on restricting projects insofar as they may adversely affect groundwater supplies, propose to export groundwater outside of the basin or county boundaries, degrade groundwater quality, or cause land subsidence. However, other groundwater ordinances have a broader scope, and are also geared toward managing groundwater resources for existing needs and planned growth.

Ordinances are typically implemented in connection with groundwater extraction permits, and center on whether the basin is operating within its "safe yield." Generally, safe yield is the amount of water that can be produced from a groundwater basin under a certain set of circumstances, over a given amount of time, without causing basin overdraft and without causing other adverse impacts.

O.W.L. has proposed the idea of using groundwater ordinances to the County Board of Supervisors, the County Water Agency, and various municipalities as a potential means of addressing and alleviating the impending water crisis in Sonoma County. To date, however, those agencies have not taken steps to craft or implement a new groundwater ordinance.

C. Groundwater Management Plans Can Harmonize Countywide Efforts to Preserve and Protect Water Resources

In 1992, the State Legislature adopted the "Groundwater Management Act" which is commonly referred to as AB 3030. (The Act is set forth by California Water Code Sections 10750 to 10755.4.) AB 3030 begins with the following proclamation by the Legislature concerning the protected status of groundwater:

> "The Legislature finds and declares that groundwater is a valuable natural resource in California, and should be managed to ensure both its safe production and its quality. It is the intent of the Legislature to encourage local agencies to work cooperatively to manage groundwater resources within their jurisdictions."

A groundwater management plan under AB 3030 may be adopted by any local agency, including municipalities, that provides water service, flood control, groundwater management, or groundwater replenishment. Pursuant to AB 3030, groundwater management plans address a wide range of management issues, including, but not limited to: (a) controlling saline water intrusion; (b) identifying and managing wellhead protection areas and groundwater recharge areas; (c) regulating migration of contaminated groundwater; (d) administering well abandonment and well destruction programs; (e) mitigating the effects of groundwater overdraft; (f) replenishing groundwater extracted by producers; (g) monitoring groundwater levels and water storage; (h) facilitating conjunctive use operations; (i) identifying well construction policies; (j) constructing and operating groundwater contamination cleanup, recharge, storage, conservation, recycling, and extraction projects; (k) developing relationships with state and federal regulatory agencies; and (l) reviewing land use plans and coordinating with land use planning agencies to assess activities that create a reasonable risk to groundwater resources and management.

O.W.L. has strongly advocated for the Somona County Water Agency to develop and implement a groundwater management plan. Recently, as part of its process to restructure the entitlement contracts to Lake Sonoma water in response to the Eel River decision, the Agency has more openly acknowledged the need to prepare such a plan. However, successful water management requires cooperation and "buy in" from surrounding agencies concerning efforts to moderate water production and conserve resources. That type of approach could easily be scuttled by the proposed Casino project.

VI. THE PROPOSED CASINO NEAR THE CITY OF ROHNERT PARK CONTRAVENES ALL ABOVE-MENTIONED PRINCIPLES OF WATER RESOURCE MANAGEMENT

Now that O.W.L. and other concerned members of the public are beginning to make progress with County and local decision-makers regarding water resource management, a new proposal is being made to locate a Las Vegas-style Indian gaming casino and hotel/retail complex just outside the city limits of Rohnert Park. Aside from the environmental impacts that this project would cause to various other County resources (i.e., wetlands, endangered species, growth inducing impacts), the

proposed Casino would drive a galvanized nail into the coffin of Sonoma County's water supplies.

Under federal case law (the "Winters Doctrine"), when an Indian reservation is established, "federally reserved water rights" attach to the reservation land for purposes of supporting the purposes and livelihood of the Indian Nation for which the reservation was created. The Winters Doctrine illustrates that federally reserved water rights enjoy powerful priority over pre-existing, state-based rights, and are protected against loss, interference, or injury. Indian water rights are protected pursuant to the trust relationship that exists between the federal government and Indian Nations. The federal government has an affirmative duty to protect the viability of these water rights and is subject to liability for failure to do so. Examples exist statewide of multi-million dollar settlements in favor of claims by Indian Nations that injury has been caused to their federally reserved water rights.

In light of the foregoing, serious implications could arise from the establishment of federally reserved water rights in the Sonoma County groundwater basin system. Given the groundwater overdraft and surface water problems that already prevail in the southern portion of the Santa Rosa Plain Groundwater Basin (*see discussion above*; Attachments B and C), those federally reserved rights would further jeopardize the ability of existing landowners and water purveyors to exercise their water rights. For instance, the well-documented overdraft in the Rohnert Park area already contributes to degradation to local water quality and has required surrounding water users to drill deeper wells. Water extracted for the Casino project would only magnify those problems. Moreover, overdraft conditions may result in a groundwater adjudication, where rights to produce groundwater now and in the future would be divided among landowners, cities, and other water agencies according to legal priority. Given the heightened priority that is afforded to federally reserved water rights, local landowners and agencies that have relied upon County groundwater for generations could be subject to enormous and irreparable harm.

In addition to those concerns, an Indian Nation would not likely be required to comply with CEQA, SB 221 and SB 610, a locally enacted groundwater ordinance, or a groundwater management plan due to its status as a sovereign nation.

Thus, despite whatever solutions may be crafted to address the County's water resource crisis, the Casino could be permitted to turn a blind eye and continue groundwater production, depletion, and mismanagement of the local groundwater basin.

As the Casino proposal is first dependent on the project site being designated as federal reservation land, O.W.L. has advocated for strict environmental review under the National Environmental Policy Act ("NEPA"), which applies to federal discretionary decisions that may "significantly affect the human environment." O.W.L. has argued that, at a minimum, the factors of (1) a critically overdrafted groundwater basin, (2) the Countywide surface water limitations under the Eel River decision, (3) the current Williamson Act designation of the proposed Casino site, and (4) the existence of multiple endangered species issues at the proposed site give rise to the need for thorough federal NEPA review before the proposed site is designated as a federal reservation.

VII. CONCLUSION

Many other groups and local citizens are objecting to the proposed Casino project on various legal, social, and environmental grounds. While supporting and concurring with many of those objections, O.W.L. is focused on the key point that any invitation to create a federally reserved water right in the local, overdrafted basin is an ill-conceived idea that would exacerbate the existing water crisis and contravene the water-related interests of the County, its cities, and all Sonoma County residents.

Find this article at:
http://www.BettingMagazine.com/managearticle.asp?c=280&a=7898

Tribe Considers Alternate Casino Sites

Jul 12, 2003

Representatives for the Graton Rancheria tribe are actively looking at as many as a dozen alternate locations for their proposed casino in the face of continuing opposition to their Sears Point site.

Sonoma County officials confirmed that consultants working with the tribe are asking detailed questions about a number of areas along the Highway 101 corridor.

"They are looking at other sites for gaming facilities. They've gotten various land-use maps and other things from the county," said County Counsel Steven Woodside. Woodside declined to be more specific about the locations, other than to say the available plots of land are near Highway 101, between the Petaluma area and Santa Rosa.

"The logical place to look for sites that are consistent from a land use and general plan point of view, would be along the 101 corridor," Woodside said. "I think the tribe is interested in sites that are closer to the center of the Bay Area, rather than farther away."

He said tribal representatives have been discussing "the pros and cons of having the site closer to a city, or in a city." But it was uncertain Friday whether the tribe is backing away from its highly controversial choice at Highway 37 and Lakeville Road.

"I think they are sincerely considering other sites. As to whether other sites from their perspective will be better than the Highway 37 site remains to be seen," Sonoma County Supervisor Mike Kerns said.

Kerns said there isn't any obvious place to put a casino. In a one-sentence statement released Friday, tribal chairman Greg Sarris confirmed the tribe is complying with requests by Sen. Dianne Feinstein and other officials to look for alternate sites for a casino.

Woodside said the tribe is spending time and money exploring alternatives and doing environmental analysis The Graton Rancheria's plan to build a casino resort near Sears Point with the backing of a Nevada gaming corporation has run into a wall of opposition from county supervisors in Sonoma, Marin and Napa.

Reps. Lynn Woolsey, D-Petaluma, and Mike Thompson, D-St. Helena, and Feinstein recently introduced legislation that would subject the project to rigorous environmental review and make it more difficult for the tribe to develop any site it chooses.

County officials say the tribe may be recognizing the strength of the opposition and the need for community support. Indian tribes have sovereign rights and are not subject to local land use rules once their land is taken into federal trust for a reservation. Federal law allows tribes to develop gambling, although they are subject to the conditions set by the governor in a gaming compact.

Opponents say the project is ill-suited for the environmentally sensitive shore of San Pablo Bay with its limited water and wastewater capacity, and predict major traffic jams on an already busy Highway 37.

While Sonoma County supervisors are opposed to the Sears Point site, they also expressed a willingness to work with the tribe to explore other possibilities. Woodside said the tribe appears to be complying with the county's request to hold off on exercising remaining options on the 2,000 acres that Station Casinos Inc. is buying for the tribe, as well as applying to the federal government to hold the land in trust.

So far Station Casinos has paid $4.3 million for 321 acres of the Sears Point site, but has not consummated the remaining purchase of 1,679 acres. Rohnert Park officials have been in contact with the real estate development company representing the tribe about the possibility of finding land in the northwest area of the city for a casino site.

Last week, Rohnert Park officials said finding 200 acres for the tribe's reservation is a long shot, but a smaller project -- 20 acres for example -- is still possible. Woodside said it makes sense for the tribe to be discrete about new locations it is considering.

"They are reluctant to go public about this for good reasons," said Woodside. "They are concerned some alternatives might be priced out of their range, or things could happen to make it more difficult for them on alternatives they might find."

Previously, Sarris has said that as soon as landowners find out a tribe is interested in land, the selling price can double because owners know there is a prospect of lucrative gaming.

Although the congressional bill that restored the Graton Rancheria allows the tribe to establish a reservation in Marin or Sonoma counties, the tribe appears to be focusing on alternate sites in Sonoma County, where there is less anti-growth sentiment.

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Tribe looking at Petaluma sites for casino

August 13, 2003

By LOIS PEARLMAN and CHIP McAULEY
ARGUS-COURIER STAFF

A local Indian tribe is looking at alternative sites for a gambling casino as opponents to the plan released a study saying the casino would cause "irreparable" environmental damage if it is built on a proposed site along Highway 37.

Some of the alternative sites are reportedly in the Petaluma area.

The Federated Indians of the Graton Rancheria, a 558-member tribe that received its federal recognition in 2000, is planning to build a casino and resort on a 2,000-acre site at the junction of Highway 37 and Lakeville Highway near the shore of San Pablo Bay.

Tribal chairman Greg Sarris has said the facility would cover about 200 acres, and the rest of the property would be restored as wetlands or reserved as open space with public access.

But opponents, including 16 Northern California environmental organizations, say the tribe's preferred site is the worst possible place for a casino.

"It is hard to conceive of a more unsuitable or ecologically damaging site on which to locate a development of this nature and scale," is the conclusion drawn in a report released last month on the environmental impacts of the proposed development.

The report was prepared by the Bay Institute of Novato, the Sonoma Land Trust and the Sonoma Ecology Center. The Bay Institute and the Sonoma Land Trust are both involved in efforts to restore some 21,000 acres of former wetlands along San Pablo Bay that were drained and converted to farmland about a century ago.

Possible negative environmental effects of the casino cited in the study include: endangerment of over a dozen sensitive plant and animal species, conflict with county land use designations, encouraging more growth, loss of wetlands and other natural habitat, ground subsidence due to well drilling, increases in traffic, artificial light, noise and air and water pollution, and disruption of the contiguity of wetlands restoration efforts.

Although tribal members say the Highway 37 property is still its top choice, representatives of the tribe and its business partner, Station Casinos of Las Vegas, have been looking at several other properties.

Sonoma County Counsel Steven Woodside said his staff has prepared parcel-specific land use maps for the tribe for properties along the Highway 101 corridor from Rohnert Park south to the county line. The tribe is also looking at some sites in Marin County, he said.

Petaluma councilmember Mike Healy said representatives of the tribe had talked with him about several properties in the Petaluma area, including the KOA campground on Rainsville Road and the Petaluma Village Premium Outlets on Petaluma Boulevard North.

However, representatives for the two properties said they have not spoken with anyone about the casino proposal. Brad Stipe, director for Chelsea Properties which owns the Petaluma Village Premium Outlets, said his company had not been contacted by the tribe. Chris Wood, son of KOA campground owner Wayne Wood, said the tribe had made no contact with them.

The KOA is a 60-acre site bordered by several other tracts of land. Both properties are prone to flooding.

City officials said the current casino proposal includes:

2,000 slot machines

100 game tables

A 1,000- to 1,500-seat theater

A hotel with 200 to 300 rooms

Multiple restaurants and a lounge

Healy called the likely impacts of the project "ugly." He cited traffic and circulation problems and the land being in the 100-year flood plain as major issues. He speculated that a casino in Petaluma would mean "significant negative impacts to the character of the community."

Other local officials agreed with Healy. Petaluma Mayor David Glass said he would be "adamantly opposed" to efforts to locate any casino in Petaluma.

"It's not something I would choose for my family," he said.

Beyond environmental impacts, Glass criticized what he called the "sleazy elements" that he said go along with gambling, including drugs, increased crime rates and prostitution. Locating a casino in Petaluma, Glass said, would be "devastating to the quality of life in Petaluma." He said such a project could not be justified.

Glass urged that the tribe seek alternatives to providing for its future development, calling a casino in Petaluma "exploitation" of the community, the tribe, and current legislation.

Several other properties are on the list of possibilities, although no one was willing to disclose which sites the tribe is considering.

Woodside and his staff have been meeting with representatives of the tribe and Station Casinos at least once a week to address issues of land use, water, sewer and other concerns.

He said the tribe has agreed to "hold off" on exercising its purchase option on the Highway 37 property until it explores the other alternatives.

Under federal law, the tribe has to secure ownership of the land, then go through the process of having it declared a trust land. If the site is accepted as trust land, the tribe would have complete sovereignty over the property and would not have to comply with land use or environmental laws, or pay taxes.

However, the tribe has offered to pay the county up to $160 million ovr the first 20 years to cover the cost of services like firefighting and law enforcement.

Meanwhile, Rep. Lynn Woolsey, D-Petaluma, and Sen. Dianne Feinstein, D-California, have introduced legislation at the federal level which would subject the Graton tribe to stiffer regulations for any trust lands.

Under the Indian Gaming Regulatory Act of 1988, any tribe which was granted federal recognition after that date is able to acquire its first trust land without submitting to comprehensive environmental review. The Feinstein-Woolsey legislation would exempt the Graton tribe from the 1988 act.

Congress is currently in recess, and the legislation will be considered when it returns in September.

Woodside said he expects the tribe to make an announcement about a casino site "within the next month."

(Contact Lois Pearlman or Chip McAuley at argus@arguscourier.com.)

return to your story

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

REPLY TO
ATTENTION OF
CESPK-PM-H (200-1c)

10 September 1999

MEMORANDUM FOR Commander, South Pacific Division,
ATTN: CESPD-PM-R (Vincent Del Greco)

SUBJECT: Inventory Project Report for the Former Defense Property at Outer Landing Field, Cobb, California Property No. J09CA7470.

1. The enclosed Inventory Project Report (INPR) addresses our current evaluation of the subject property. This report was prepared as a result of research conducted for other sites which indicated that additional investigation was required. This additional investigation found that an OE Project and a CON/HTRW Project were needed. The enclosed report supersedes any previously submitted report of the property.

2. I recommend that you approve the proposed CON/HTRW and OE Projects and provide a copy of the report to the Huntsville Design Center for their records.

FOR THE COMMANDER:

Encl

for MARK C. CHAMTON
Chief, Programs and Project
Management Division

CESPD-PE

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

3. This memorandum authorizes the OE (J09CA747001) and the CON/HTRW (J09CA747002) projects as recommended by the INPR, and assigns the CON/HTRW project to CESPK for their appropriate action. The OE project is referred to Huntsville Army Engineering and Support Center to determine the need for further action.

Encl

PETER T. MADSEN
COL(P),EN
Commanding

DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, CORPS OF ENGINEERS
333 Market Street, Room 923
San Francisco, California 94105-2195

REPLY TO
ATTENTION OF:

27 SEP 1999

CESPD-PM-R

MEMORANDUM FOR

Commander, U.S. Army Corps of Engineers, 20 Massachusetts Avenue, N. W., Washington, DC 20314-1000

Commander, U.S. Army Engineering Center, Huntsville, P.O. Box1600, Huntsville, Alabama 35807-4301

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

1. References:

a. Memorandum CEMP-RF, 17 Jan 1997, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Delegation of Preliminary Assessment of Eligibility /Inventory Project Report (PAE/INPR), Project Approvals to Division Commanders.

b. DERP-FUDS Program Manual, U. S. Army Corps of Engineers, Directorate of Military Programs, Division of Environmental Restoration, Washington, D.C., July 96.

c. CEMP-RF memorandum, 16 Oct 96, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Preliminary Assessment Funding.

2. The enclosed INPR for Outer Landing Field, Cotati is approved by SPD in accordance with Ref 1a, 1b, and 1c. The INPR is being forwarded to you for your information and appropriate action. The site has been determined to be eligible for DERP-FUDS.

PILOT STUDY OF GROUNDWATER CONDITIONS IN THE JOY ROAD, MARK WEST SPRINGS, AND BENNETT VALLEY AREAS OF SONOMA COUNTY, CALIFORNIA

September 17, 2003

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A Report Prepared for:

Sonoma County Permit Resource Management Department
2550 Ventura Avenue
Santa Rosa, California 95403

SUMMARY OF FINDINGS
WATER RESOURCES MANAGEMENT
DATA ASSESSMENT
SONOMA COUNTY, CALIFORNIA

Kleinfelder Job No: 41- 478401/003
September 17, 2003

Prepared by:

Peter A. Dellavalle
Project Geologist

Reviewed by:

Christopher S. Johnson, R.G.
Senior Project Manager

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1. INTRODUCTION

1.1 BACKGROUND

Large areas of Sonoma County are identified as water scarce. Although the amount of annual rainfall in the County is fairly generous, the availability of groundwater in the water scarce areas is limited, primarily by geology and topography. As the County's population, industry and agriculture have grown, more development has taken place in these water scarce areas. Consequently, there has been an increasing demand for groundwater. In recent years citizens have reported that groundwater conditions are changing and that further development may adversely affect groundwater availability.

In response to these concerns, the County of Sonoma has sought a greater understanding of groundwater conditions in the water scarce areas. The County retained Kleinfelder to conduct pilot studies of groundwater conditions in three special study areas. These areas were chosen based on the findings of Kleinfelder's previous study. In that study Kleinfelder plotted the location of building permits issued in the past five years for new wells or other projects dependent on the availability of groundwater. The plot revealed several locations within the water scarce areas of the county where there has been a concentration of building and well construction. These were identified as *Areas Experiencing Development Pressure*. The Joy Road, Mark West Springs, and Bennett Valley areas were selected for further study because they have had the densest concentrations of water dependent building.

1.2 PROJECT OVERVIEW

This study used existing data to explore the factors affecting the availability of groundwater in the three special Study areas. The data were used to characterize the geohydrologic setting, land use, and water demands in each study area and describe apparent constraints on groundwater availability. A statistical analysis of data from driller's boring logs was used to evaluate trends

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in the depth to water and completion depth of new wells over time. Finally, conclusions based on review of this work were used to identify questions for further study and to develop recommendations to address them. It is important to keep in mind that this study was limited by the availability of existing data and did not include fieldwork.

The study began with the establishment of study area boundaries. The boundaries were set to meet the objective of the study, which, basically, is to understand how changes in one component of a natural system affect other components within that system. In this case the change is increased pumping, the natural system is the water cycle, and the affected component is the occurrence and availability of groundwater. To be efficient each study area had to be large enough to include the causes and effects of change but no larger. Setting larger boundaries would waste investigative effort studying unaffected parts of the system. The smallest functioning unit in the water cycle is a watershed, an area bounded by a divide and draining inwardly to one outflow point. Many factors within a watershed can significantly affect groundwater but conditions in adjacent watersheds generally have little effect. Ideally, the Study Area boundaries would be limited to the smallest single watershed the completely encloses the *Area Experiencing Development Pressure*. This was ideal was achieved for the Bennett Valley Study area but had to be compromised in the Joy Road or Mark West Study areas. In the Joy Road Study Area the *Area Experiencing Development Pressure* is situated along a series of ridges that separate five small watersheds. In the Mark West Study Area, Mark West Springs Creek carries water from upstream watersheds through the Study Area. USGS 7.5 minute topographic maps were used as a base for delineating the boundaries and as the primary reference for place and feature names. The Study Area boundaries for the Joy Road Study Area are shown on Plates 1, and 2, for Mark West on Plates 9, and 10, and for Bennett Valley on Plates 17, and 18.

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Once the boundaries were established Kleinfelder researched existing data to develop a better understanding of the conditions affecting the availability of groundwater in the special study areas. Kleinfelder's research focused on factors that are key to understanding groundwater conditions including:

- Geology
- Climate
- Land use patterns
- Development history

Geology is considered the most important factor because it is the medium in which groundwater occurs. Geologic conditions vary from place to place and some geologic materials hold a great deal of water and others do not. Geology also affects the depth, distribution, and quality of groundwater. Where and how much of that groundwater is used are functions of land use. Residential, agricultural, and other uses all have widely different demands on groundwater resources. Discussions of the factors affecting the availability of groundwater in each of the study areas are included in Sections 2, 3, and 4.

Kleinfelder prepared GIS maps and databases to represent and analyze the collected data. GIS shape files and data tables were created in ArcView 8.3 format using orthophotography, parcel maps, street maps and elevation contours from PRMD's GIS database. Copies of Kleinfelder's maps and data are included with this report on a compact disc.

Kleinfelder also evaluated historical groundwater information. Ideally, we would look at historic records of conditions in existing wells to see if water levels and well yields are changing with time. However, there are no Department of Water Resources monitoring wells near the study areas and monitoring of private wells is not required in Sonoma County so, unfortunately, no such data is available. Another way is to look at the depth to water and completion depth of new wells over time. Are drillers digging deeper and deeper with time? A statistical evaluation of well log data is included in Section 5.

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Review of the collected data and maps has led to a number of conclusions that are presented in Section 6. Although these conclusions provide new insight, there remain a number of unanswered questions. Chief among them are "How are conditions changing in individual wells?" and "How much water can be sustainably supplied?" Answers to these questions would require a more complete understanding of groundwater conditions based on field observations and aquifer testing. Kleinfelder's suggestions for further study, including fieldwork, are included in Section 7.

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2. JOY ROAD STUDY AREA

2.1 STUDY AREA BOUNDARIES

The Joy Road Study Area is about 4 miles long and 3 miles wide and covers about 9 square miles. The boundaries and principal features of the Study Area are shown on Plate 1. Because development pressures in the Joy Road area are occurring along the ridge tops, the boundaries of the Study Area had to include more than a single watershed to envelope the developing areas. The western boundary of the Study Area roughly follows Fitzpatrick Lane along the ridge between Coleman Valley and Fay Creek. The southern boundary crosses Fay, Thurston, and Nolan creeks at the base of the hills just north of Bodega Highway. The eastern boundary follows the ridge top east of Nolan Creek to the highpoint and then down a ridge southeast of Bittner Road almost to the town of Occidental. The northern boundary generally follows Coleman Valley Road from Occidental to its intersection with Joy Road.

2.2 TOPOGRAPHY

The topography of the Joy Road area is characterized by broadly arching ridges dissected by steep-sided creek bottoms. The ridges run predominantly from north to south but run in an easterly direction toward Occidental in the northeastern section of the Study Area around the headwaters of Salmon Creek. The topographic features of the Study Area are illustrated on Plates 1 and 2. The Maximum elevation in the Study Area is about 1100 feet above mean sea level, and minimum elevation is about 100.

2.3 DRAINAGE

Fay, Thurston, Nolan and many smaller unnamed creeks drain the Joy Road Study Area. All of these streams are tributaries of Salmon Creek, which begins near the intersection of Joy and Bittner Roads and flows to the northeast toward Occidental. It turns just short of the town and flows away from the Study Area to the southeast past Freestone and then west along the Bodega

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Highway. It runs along the southern boundary of the Study Area for a short distance near the mouth of Fay Creek.

2.4 GEOLOGY

The bedrock of the Joy Road Study Area consists of the Franciscan and the Merced Formations and a relatively small outcropping of the Great Valley Sequence. A map showing the generalized geology of the Study Area is shown on Plate 3.

2.4.1 Franciscan Formation

The Franciscan Formation is composed of marine sediments and volcanic rocks. These rocks are intensely sheared, folded and faulted. Near the center of the Study Area just east of Joy Road, the Franciscan Formation outcrops with members of the Great Valley Sequence, which consists of sandstone, shale, siltstone, and conglomerate.

The Franciscan Formation is mostly a tight, non-porous rock unit and groundwater occurs only in secondary openings such as joints, fractures, and shear zones. As a result, well yield is typically low, 1 to 3 gallons per minute (gpm), although wells with yields as high as 68 gpm are recorded (Ford, 1975).

2.4.2 Merced Formation

The Merced Formation is composed of fine to very fine-grained sandstone with many fossiliferous zones. These sediments were deposited on top of the eroded surface of the Franciscan Formation in a calm inland sea. The Merced is exposed on about 54 percent of the Study Area. About 42 percent occurs on the ridges, the rest is at lower elevations in the southeastern portion of the Study Area east of Bodega and is not accessible by wells on the ridges. Along the ridges, the thickness of the Merced Formation ranges from tens of feet to more than two hundred feet. Its thickness is likely much greater in the valley and along the base of the hills north of the Bodega Highway.

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U.S. Department of Agriculture data (1950) indicates that the Merced Formation in the area southwest of Sebastopol has an infiltration rate of 0.7 acre-feet per acre per day. This is a relatively rapid rate and it suggests that efforts to enhance recharge could be very productive.

In the rocks of the Merced Formation, spaces between the grains of sand store a great amount of water that flows easily into wells. The formation produces large amounts of good quality water. Yields range from 20 to 1,000 gpm with minimal draw-down (Ford, 1975).

2.4.3 Alluvium

Sediments eroded from the surrounding hills have been deposited in unconsolidated deposits along Salmon, Fay, and Thurston, Creeks where the grade is shallow. These sediments are highly variable in composition and may be as thick as 150 feet.

According to Ford (1975) well yields are highly variable in the alluvium. He reports yields ranging from 10 to 140 gpm. Water quality from alluvial sediments is generally of good quality.

2.5 PRECIPITATION

Rainfall in the Joy Road area has been recorded by a number of residents including some who collect data for the National Oceanic and Atmospheric Administration (NOAA) and other government agencies. The data collectors willingly supplied copies of these records to Kleinfelder. The data are summarized in Appendix A along with data from NOAA stations in Occidental and Graton. There is a considerable variation in annual rainfall from station to station suggesting the presence of a number of microclimates within the Study Area. In some years rainfall totals vary by as much as 30-inches between stations. The average of annual precipitation recorded at all stations is about 55-inches per year and varies from less than 20 (1976) to 91 (1982) inches per year.

The total volume of water that rains on the Joy Road Study Area in an average year is about 26,750 acre-feet (8.7 billion gallons). The input ranges from about 10,049 acre-feet (3.2 billion gallons) in the driest year to 43,546 acre-feet (14.1 billion gallons) in the wettest.

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2.6 RUN-OFF

Stream flow data is available from a stream gauge in Salmon Creek about a half mile northwest of Bodega. Daily mean stream flow values, in cubic-feet per-second were collected from August 1, 1962 to October 1, 1975. The drainage area above the gauge is 15.7 square miles, including the 8.9 acres of the Study Area. The Study Area accounts for about 60 percent of the total drainage area. The stream flow data is included in Appendix B.

2.7 EVAPOTRANSPORATION

Evapotransporation (Et) data are not available specifically for the Joy Road Area. However, the California Irrigation Information System produces data representing conditions in the north coast valleys.. The data is collected from stations in Healdsburg, Santa Rosa, Windsor, Petaluma, Bennett Valley, and Valley of the Moon as well as several stations in Mendocino Counties. The evapotransporation, precipitation, and other relevant data from the Sonoma County stations are summarized in Appendix A.

2.8 LAND USE

The principal use of land in the Joy Road Study Area is residential. Agricultural uses, primarily vineyards, also occur. Historically the area was used for timber harvest and then for apple orchards. Some timber harvest still occurs in the area but all but a few of the apple orchards have been removed or abandoned.

2.9 RESIDENTIAL LAND USE

As of 2000 there were 323 property owners with permanent addresses at lots in the Joy Road Study Area according to Metroscan. Residential development occurs almost exclusively on the broad ridge tops of the Study Area. A map of structures visible in 2000 aerial photography illustrates this (Plate 4). Despite minimum lot size requirements, steep slopes limit the availability of suitable building sites and force the concentration of homes on the ridges. The resulting concentration of housing can be seen in the density distribution map shown on Plate 5.

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2.10 HISTORIC RESIDENTIAL USE

As a basis of comparison, Kleinfelder compared the number of structures visible in aerial photographs from 2000 to the earliest complete coverage available. The dates and areas covered by historic aerial photographs of the Study Area are shown on Plate 6. The earliest photos for which complete coverage is available were taken in 1980. However, photos from 1953 picture most of the southern portion of the Study Area. 47 percent of the structures visible in 2000 are located within the footprint of the 1953 photos. There are 43 structures visible in these early photos. In 2000 there were 172 structures visible in the same area. In the 47 years separating the two photos, 129 structures were constructed. This represents an annual rate of 2.7 new structures per year.

The Joy Road Plan (Sonoma County Planning Department, 1974) notes the presence of 256 households within an area of 6,984 acres that includes the Joy Road Study Area. Assuming that the distribution of households is proportional, there were about 210 households in the Study Area in 1974. According to Metroscan data, there were about 323 households in the Joy Road Study Area in 2000, an increase of 113 households or, about 4.3 households per year.

The plan also notes that there were 434 parcels of land in 1974, roughly 359 in the Study Area. Assessor's records from 2000 indicate that there were 466 parcels in the Study Area. Since 1974 the number of parcels within the Study Area has increased by 107 parcels or about 4 parcels per year.

2.11 CURRENT RESIDENTIAL WATER DEMAND

On average, Northern California households use from ½ to 1 acre-feet of water per year. An acre-foot is slightly less than 325,829 gallons. Using this assumption, the 323 permanent households of the Joy Road Study Area can be expected to use from 162 to 323 acre-feet (52 to 156 million gallons) of water per year.

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2.12 HISTORICAL RESIDENTIAL WATER DEMAND

Increase in water demand should be proportional to residential growth. If water consumption has grown at a rate comparable to the increase in structures (6.3 percent per year) and the consumption rate per household has not changed, the total consumption has grown from between 22 to 43 acre-feet (7 and 14 million gallons) per year in 1953 to the current rates noted above.

The Joy Road Plan (Sonoma County Planning Department, 1974) indicates that in 1974 there were about 210 households in the Joy Road Study Area. At ½ to 1 acre-foot per household per year, the residential water demand in 1974 was between 105 and 210 acre-feet (34 and 68 million gallons) per year.

2.13 FUTURE RESIDENTIAL USE TRENDS

The Sonoma County Permit and Resource Management (PRMD) Department estimates that the Joy Road Study Area is developed to about 70% of the maximum build-out allowable by zoning. The department estimates that 159 units can still be built, 131 of which will be single units on existing vacant lots and the remainder will be on lot splits. These numbers do not take into account the possibility of second units constructed on developed lots. Mr. Carr cautions that the estimates are based on assessor files, which might undercount existing units and therefore undercount potential units.

If the remaining 159 potential units are developed and water use rate per household remains constant, the total water demand will increase by as much as 159 acre-feet (51 million gallons) per year.

2.14 AGRICULTURAL USE

Active commercial agriculture in the Joy Road Study Area is limited in size and is composed almost entirely of recently planted vineyards. Analysis of aerial photographs indicates that, in addition to vineyards, there are a few relatively small plots that appear to be used for production of truck crops. Many former apple orchards are still apparent in aerial photos, but most do not

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appear to be actively farmed. The distribution of cultivated land is shown by crop type on Plate 7.

Vineyards of the Joy Road Study Area occur primarily on former grasslands on Fitzpatrick and Taylor lanes. The total area devoted to vineyards in 2000 was about 80 acres.

2.15 HISTORIC AGRICULTURAL USE

Land use in the Joy Road Study Area was almost entirely agricultural until the mid 1960s. Apples were the primary crop grown. Other agricultural activities included livestock grazing and timber harvesting.

Vineyards are a fairly new activity in the Joy Road Study Area. Of the 80 acres planted in 2000, just 30-acres were present in 1990. Only 21-acres of vines were apparent in aerial photos from 1980, all of them along Taylor Lane.

2.16 CURRENT AGRICULTURAL WATER DEMAND

According to Sonoma County Farm Adviser, Rhonda Smith, the amount of irrigation water applied to vineyards in Sonoma County ranges from none to nearly 8 acre-inches per acre per year. The amount varies with the proximity of the vineyard to riparian zones, the depth, permeability and holding capacity of the soil, and the degree of slope on which the vineyard is planted. In Smith's experience 90 percent of Sonoma County vineyards apply 4-acre-inches per year or less. Irrigation requirements in the Joy Road area are likely much less due to marine influences, primarily summer fog. However, to be conservative Kleinfelder used this figure to estimate total vineyard demand. At this rate the Joy Road vineyards apply 27 acre-feet (8.7 million gallons) of water per year. The actual source of this water is not presently known but is assumed to be from wells near the vineyards.

There does not appear to be any active farming of the Joy Road apple orchards. Even if some orchards are still active, irrigation water was not typically applied to apples in the west county area.

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The irrigation demands of truck crops vary greatly by crop growing season and site conditions. As a conservative estimate, Kleinfelder assumed that the small truck crop plot within the Joy Road Study Area apply 6 acre-inches per year. At this rate, the truck crops consume about 1.5 acre-feet (501 thousand gallons) per year.

In total, the agricultural water demand in the Study Area is estimated to be about 28 acre-feet (9.2 million gallons) per year.

2.17 HISTORICAL AGRICULTURAL WATER DEMAND

Past agricultural use of the Joy Road Study Area was more intensive than it is today. In the 1940s and 1950s, about 143 acres were cultivated, 44 percent more than 2000.

2.18 FUTURE AGRICULTURAL TRENDS

According to the Sonoma County Farm Advisors office, vineyard development in the west county can be expected to grow. Ultimately, the area used for vineyard will be controlled by topography, geology, the availability of water, and competition with residential and other uses.

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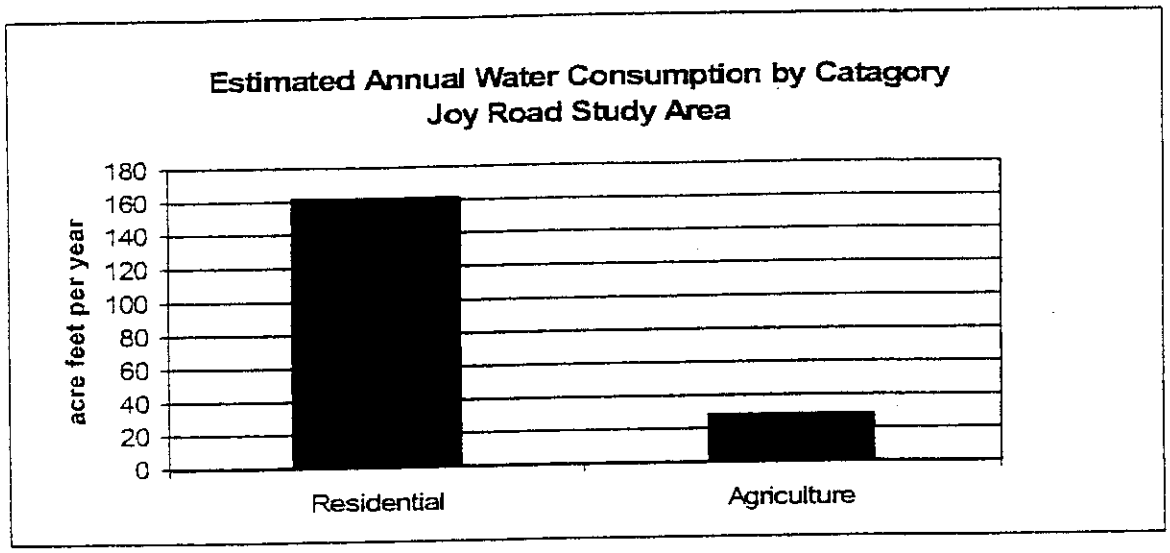
2.19 COMPARATIVE WATER USE

A comparison of water use within the Study Area is shown by category on the chart below:



2.20 CONSTRAINTS ON GROUNDWATER AVAILABILITY

The principal constraint on the availability of groundwater in the Joy Road Study Area is the underlying geologic framework of the area. About 56 percent of the Study Area rests on the Franciscan Formation, which typically has yields of less than 3 gpm. A list of lots with water availability problems was compiled by a citizens group of Joy Road residents. The group identified lots with no water and lots that seasonally run dry. A comparison of the location of these properties relative to the bedrock geology shows a strong correlation between water availability and geology. Of the 11 lots with no water, 5 appear to be on Franciscan bedrock and the other 3 are on the Merced Formation in areas where it appears to be less than 100 feet thick (Plate 8). Maps with greater detail are needed to evaluate this relationship.

The topography of the Joy Road Study Area constrains the availability of groundwater in a number of ways. Steep slopes and canyons encourage run-off and limit the area suitable for building. This has forced most construction onto the rounded ridge tops resulting in the

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concentration of homes and wells in narrow bands that parallel the ridges (See Plates 4 and 5). The groundwater recharge potential on ridge-top lots is limited by this topography. Recharge to any one lot is derived from infiltration of precipitation that falls directly on it and from surface and groundwater flow from up gradient lots. Because lots on hilltops and ridges receive little or no input from up-gradient sources, the recharge potential is mostly limited to the surface area of the lot itself.

The existing aquifer from which many of the homes obtain their well water leaks. Numerous springs exist between the contact of the overlying Merced Formation and the underlying Franciscan Formation. These springs are fed by groundwater accumulated in the Merced Formation that cannot penetrate downward into the Franciscan, and as such, moves laterally to lower hydraulic head. Flow from the springs limits the amount of water that can be held in storage. However, spring flow is important to wetland and riparian habitats as well as downstream fisheries.

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3. MARK WEST STUDY AREA

The Mark West Study Area is an intermountain valley just north of the city of Santa Rosa. It is about 4 miles long and 3-miles wide encompassing an area of about 7.5 square miles. The west boundary crosses Mark West Springs Road about 1¼-miles east of Highway 101. From there it follows the drainage divide north until it drops and crosses Mark West Springs Road near the beginning of Leslie Road. The boundary then rises along a ridge on the opposite side and follows the divide until it descends to Foothill Ranch Road near its intersection with Wallace Road. Continuing south, the boundary climbs the ridge behind Fountain Grove and then turns west. On the opposite side of the Fountain Grove golf course, the boundary turns northwest down the ridge top to Mark West Springs Road. A portion of the Study Area near the Fountain grove golf course lies within the City of Santa Rosa. The Study Area is outlined on Plate 9.

3.1 TOPOGRAPHY

The Mark West Study Area is a bowl shaped valley bound by parallel ridges of the Mayacama Mountains. It is separated from Rincon Valley by a saddle of low hills that stretch between the more prominent ridges and from the Santa Rosa Plain by a narrow canyon along Mark West Creek. The topographic features of the Study Area are illustrated on Plates 9 and 10.

3.2 DRAINAGE

The drainage of the Mark West Study Area is a fan-shaped network of seasonal tributaries that drain to the northwest toward Mark West Springs Creek. The Creek enters the Study Area at the extreme north edge and flows southward just inside the western boundary through most of the Study Area. It then turns sharply to the west and exits the Study Area through a narrow canyon. Mark West Springs Creek drains an area of about 30 square miles before entering the Study Area.

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3.3 GEOLOGY

The rocks of the Mark West Study Area are comprised of the Sonoma Volcanics and the Glen Ellen Formation (Plate 11). The rocks of the Sonoma Volcanics are older and lie stratigraphically beneath the Glen Ellen Formation.

3.3.1 Sonoma Volcanics

The Sonoma Volcanics are composed of thick layers of volcanic ejecta and sediments eroded from them. Resistant dikes and plugs locally pierce inter-fingering lenses and wedges of flows, tuff, and obsidian. The Study Area is sandwiched between Healdsburg Fault to the west and the Mayacama Fault to the east.

The yield of wells drilled into the Sonoma Volcanics is highly variable and unpredictable according to Ford (1975). Wells tapping volcanic sediments and tuffs with high porosity or highly fractured rock can be highly productive with little draw-down. But, massive rock with little primary porosity and no secondary fractures may not yield water at all. A short distance can separate successful wells and dry holes. Productivity ranges from less than ten to several hundred gallons per minute. The depth of wells is also highly variable, 500--feet deep wells are common.

3.3.2 Glen Ellen

The Glen Ellen formation consists of poorly sorted alluvial materials ranging from clay to cobble-sized particles. In the Study Area, the Glen Ellen rests on top of the older Sonoma Volcanics in relatively thin deposits that are only a few hundred feet thick.

Like in the Sonoma Volcanics, the yield of wells in the Glen Ellen is highly variable. Ford (1975) reports that well yields commonly range from 15 to 30 gpm, but deep wells in thick sections of Glen Ellen to north of the Study Area near the town of Windsor have recorded yields of up to 500 gpm.

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Ford (1975) reports that the quality of water from the Glen Ellen Formation varies more than that from any other formation in the Sonoma County. The water can be excellent, but in some areas there is so much sodium and other minerals that it is not potable.

3.4 PRECIPITATION

NOAA has no monitoring stations in the Mark West Study Area. The closest station is the Santa Rosa station 3 miles south of the Study Area. Precipitation data from the station are summarized in Appendix A. Variation in annual rainfall from place to place within the Study Area is expected due to the presence of microclimates. The average of annual precipitation recorded at the Santa Rosa Station is about 30-inches and varies from 11-inches per year recorded in 1976 to 63 inches in 1983.

In an average year, precipitation adds about 11,988 acre-feet (3.9 billion gallons) of water to the Mark West Study Area. The input ranges from about 4529 acre-feet (1.4 billion gallons) in the driest year to 25.102 acre-feet (8.2 billion gallons) in the wettest.

3.5 RUN-OFF

Limited stream-flow data is available from a stream gauge on the north edge of the Study Area in Mark West Creek near the Intersection of Leslie Road and Mark West Springs Road. This location is about where Mark West Creek enters the Study Area. Annual peak stream-flow value in cubic-feet per-second were collected from 1958 to 1962. Because of its upstream location, the data provide some insight on stream-flow entering the Study Area but not on flow generated within the Study Area. The data are included in Appendix B.

3.6 EVAPOTRANSPORATION

Evapotransporation (Et) data are not available specifically for the Mark West Area. However, the California Irrigation Information System produces data representing conditions in the north coast valleys. The data is collected from stations in Healdsburg, Santa Rosa, Windsor, Petaluma, Bennett Valley, and Valley of the Moon as well as several stations in Mendocino Counties. The

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evapotransporation precipitation, and other relevant data from the Sonoma County stations are summarized in Appendix A.

3.7 RESIDENTIAL LAND USE

As of 2000 there were 537 property owners with permanent addresses in county portion of the Mark West Study Area. Residential development occurs mostly within the bowl-like center of the Study Area. A map of structures visible in aerial photography illustrates this (Plate 12). Most of the hillside development occurs on the north side of the Fountain Grove ridge. Of the 173 Fountain Grove homes, 157 are in the City of Santa Rosa (Water for these homes is supplied by the City of Santa Rosa). The density of homes in this part of the Study Area is significantly greater than found elsewhere. The concentration of housing can be seen in the density distribution map shown on Plate 13. Hillside homes are also present, but widely spaced, on the prominent ridge on the eastern boundary of the Study Area.

3.8 HISTORIC RESIDENTIAL USE

As a basis of illustrating residential growth, Kleinfelder compared the number of structures visible in aerial photographs from 2000 to the earliest complete coverage available. The dates and areas covered by historic aerial photographs of the Study Area are shown on Plate 14. The earliest photos for which complete coverage is available were taken in 1951. There are 41 structures visible in these early photos. In 2000 there were 911, of which, 157 were in the city. In the 47 years separating the two photos, 870 new structures were added, a rate of 18.5 structures per year.

3.9 CURRENT RESIDENTIAL WATER DEMAND

On average, Northern California households use from ½ to 1 acre-foot of water per year. An acre-foot is slightly less than 325,829 gallons. If consumption rates in the Mark West area are comparable, the 537 permanent households in the county portion of the Study Area can be expected to use from 269 to 537 acre-feet (87 to 175 million gallons) of water per year.

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3.10 HISTORICAL RESIDENTIAL WATER DEMAND

Increases in residential use are directly related to an increase in water demand. If water consumption has grown at a rate comparable to the increase in structures (42 percent per year) the total consumption has grown from between 20 and 41 acre-feet (6.7 and 13.3 million gallons) per year in 1953 to the current rates noted above.

3.11 FUTURE RESIDENTIAL USE TRENDS

PRMD estimates that the Mark West Study Area is developed to about 75% of the maximum build-out allowable by zoning. The department estimates that 206 units can still be built, 144 of which will be single units on existing vacant lots and the remainder will be on lot splits. These numbers do not take into account the possibility of second units constructed on developed lots. PRMD cautions that the estimates are based on assessor files, which might undercount existing units and therefore undercount potential units.

If the remaining 206 potential units are developed, the total water demand will increase by as much as 206 acre-feet (67 million gallons) per year.

3.12 AGRICULTURAL USE

Active commercial agriculture in the Mark West Study Area is limited relative to residential use and is composed mostly of recently planted vineyards. In 2000, vineyards in the Mark West Study Area occupied about 55.2 acres. Analysis of aerial photographs indicates that, in addition to vineyards, there are about 19 acres planted with orchards. Several former walnut orchards are apparent in aerial photos, but most do not appear to be actively farmed. The distribution of cultivated land is shown by crop type on Plate 15.

3.13 HISTORIC AGRICULTURAL USE

Until quite recently agricultural land use in the Mark West Study Area was primarily limited to cattle ranching, dairy farming, and some walnut production. Aerial photography shows that in 1950 the dominant crop was walnut and there were no vineyards apparent in the Study Area.

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3.14 CURRENT AGRICULTURAL WATER DEMAND

Sonoma County vineyards typically apply 4-acre-inches of water per year or less. At this rate the Mark West vineyards apply 18.4 acre-feet (5.9 million gallons) of water per year. The actual source of this water is not presently known but is assumed to be from wells near the vineyards.

There does not appear to be any active farming of the Mark West walnut orchards but other orchards appear to be active. Assuming that all of the orchards are still active and irrigated at rates similar to vineyards, the irrigation demand would be about 6.2 acre-feet (2 million gallons) per year.

In total, the agricultural water demand in the Mark West Study Area is estimated to be about 24.6 acre-feet (8 million gallons) per year.

3.15 HISTORICAL AGRICULTURAL WATER DEMAND

Past crop production in the Mark West Study Area used about the same acreage as it does today. In the 1950s, the crops were different but the water demand is thought to be roughly the same. The irrigation methods employed at that time required more water to meet plant demands than methods like drip irrigation that are used today. Therefore, it is likely that more water was required in the past to meet the irrigation requirements of crops occupying the same acreage. A reliable estimate of the amount of water used would require a more detailed understanding of the irrigation practices that were actually used.

3.16 FUTURE AGRICULTURAL TRENDS

There has been some recent vineyard development in the Mark West Springs area. New vineyards have been established near the intersection of Reibli Road and Hidden Hills Road and at higher elevations on the ridge that forms the northeastern boundary of the Study Area. However, the future of agricultural development appears to be limited because much of the land has been converted to residential use.

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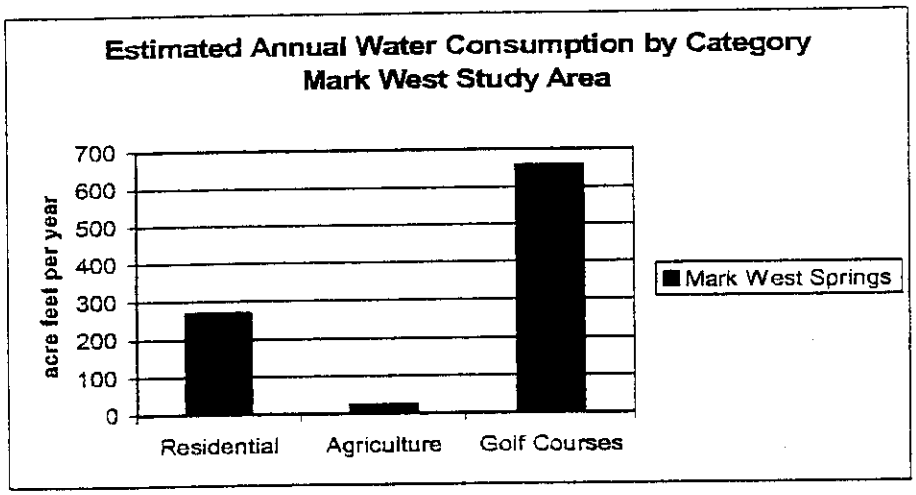
3.17 GOLF COURSES

There are two golf courses in the Mark West Study Area, the Fountain Grove course and the newly developed Mayacama course. The courses are shown on Plate 16. Both courses are irrigated with well water; although, development plans call for use of reclaimed wastewater from future homes to water the Mayacama course. According to estimates in the Shiloh Meadows EIR and subsequent responses to comments, irrigation of the Mayacama course is expected to require about 330 acre feet per year. Irrigation of the Fountain Grove Course is expected to require a similar amount.

3.18 COMPARATIVE WATER USE

A comparison of water use within the Study Area is shown by category on the chart below:



3.19 CONSTRAINTS ON GROUNDWATER AVAILABILITY

Kleinfelder's pilot study of the Mark West area did not reveal specific and significant constraints on the availability of groundwater. The aquifer underlying the Study Area is primarily fractured bedrock of the Sonoma Volcanics; though thick deposits of the Glen Ellen formation occur in the northwest portion of the area were there is relatively little development. The availably of

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groundwater in these formations is not predictable but, where groundwater is found, it is generally sufficient to supply current demand.

Despite the dramatic increase in residential use of the land over the last 50 years, there are no recognized areas experiencing water availability problems. Such problems may exist, but unlike the Joy Road and Bennett Valley Study Areas, the existence and general location of such problems in the Mark West Study Area is not common knowledge.

Further research is needed to identify the constraints on groundwater availability in the Mark West Study Area. These constraints may also be revealed as the number of groundwater users increase, the distribution of wells becomes denser and the overall rate of groundwater consumption rises.

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4. BENNETT VALLEY STUDY AREA

The north end of the Bennett Valley Study Area crosses Matanzas Creek in a cluster of low hills that lie between the summits of Bennett Peak and Taylor Mountain. The boundary rises from these hills, to the summits of both mountains and then follows the ridgelines, which define the upper watershed of Matanzas Creek. The east and west boundaries meet in the south at the summit of Sonoma Mountain. The boundaries of the Study Area are shown on Plate 17.

4.1 TOPOGRAPHY

The ridges surrounding Bennett Valley form an elongated trough with sides that drop steeply to the valley floor. Relative to the surrounding peaks the valley appears somewhat level; but the uneven valley floor encompasses a number of low hills and rises gradually to the peak of Sonoma Mountain. These features are shown with the color relief map on Plate 17 and the oblique hillside shade map on Plate 18.

4.2 DRAINAGE

Matanzas Creek and its minor tributaries drain the Bennett Valley Study Area. The creek divides near the center of the Study Area into two streams of nearly equal size. The only point of outflow is where Matanzas Creek flows north across the northern boundary of the Study Area.

4.3 GEOLOGY

The rocks of the Bennett Valley Study Area are comprised of the Sonoma Volcanics and the Petaluma Formation (Plate 19). The rocks of the Sonoma Volcanics are older and lie stratigraphically beneath the Petaluma Formation. The Study Area is divided into uneven thirds by the Bennett Valley Fault, which runs along the base of Bennett Peak and the Rogers Creek Fault that cuts along the western edge.

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4.3.1 Sonoma Volcanics

The Sonoma Volcanics are composed of thick layers of volcanic ejecta and sediments eroded from them. Structurally, the Sonoma Volcanics consist of inter-fingering lenses and wedges of flows, tuff, and obsidian pierced locally by more resistant dikes, plugs. Tectonic forces have deformed and fractured much of the Sonoma Volcanics.

The yield of wells drilled into the Sonoma Volcanics is highly variable and unpredictable according to Ford (1975). Wells tapping volcanic sediments and tuffs with high porosity or highly fractured rock can be highly productive with little draw-down. But, consolidated rock with little primary porosity and no secondary fractures may not yield water at all. Very short distances often separate successful wells and dry holes. Productivity ranges from less than ten to several hundred gallons per minute. The depth of wells is also highly variable, 500–feet wells are common.

4.3.2 Petaluma Formation

The Petaluma Formation consists of clay, shale, and sandstone with minor amounts of conglomerate. Some limestone and dolomite are present in lesser amounts. In most areas, the formation is composed predominantly of clay and other fine-grained materials. The Petaluma deposits are folded and, in the Bennett Valley area, they are in fault contact with the older Sonoma Volcanics, which they overlie in some places.

According to Ford (1975) the Petaluma formation is noted for its low yield to wells. Yields of less than 5 gpm are common. The quality of water is fair, but in places, the mineral content and electrical conductivity can be high.

4.4 PRECIPITATION

The Californian Irrigation Information System recorded weather information at a station in Bennett Valley in 2000. NOAA has no active monitoring stations in the Bennett Valley Study Area. The closest station is the Santa Rosa station 4-miles northeast of the Study Area. The data are summarized in Appendix A. Variation in annual rainfall from place to place within the Study

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Area is expected due to the presence of microclimates. The average of annual precipitation recorded at the Santa Rosa Station is about 30-inches per year and varies from 11-inches per year recorded in 1976 to 63 in 1983. In 2000, the only year for which data from the valley is available, 26.92-inches were recorded at the Santa Rosa station and 11.11-inches were recorded in Bennett Valley. However, the Bennett Valley data are flagged with notes stating, "One or more daily values are missing or flagged."

Precipitation adds about 21,657 acre-feet (7 billion gallons) of water to the Bennett Valley Study Area in an average year. The input ranges from about 8,182 acre-feet (2.6 billion gallons) in the driest year to 45,349 acre-feet (14.7 billion gallons) in the wettest.

4.5 RUN-OFF

Limited streamflow data are available from a stream gauge on Matanzas Creek about 4 miles north of the Study Area. This station only records gauge height in real-time and data are not kept more than 31 days. The data can be viewed at:
http://waterdata.usgs.gov/ca/nwis/uv?site_no=11466170.

4.6 EVAPOTRANSPORATION

Evapotransporation (Et) data from Bennett Valley are available for one year (2000). However, the California Irrigation Information System produces data representing conditions in the north coast valleys. The data is collected from stations in Healdsburg, Santa Rosa, Windsor, Petaluma, and Valley of the Moon as well as several stations in Mendocino Counties. The evapotransporation precipitation and other relevant data from the Sonoma County stations are summarized in Appendix A.

4.7 RESIDENTIAL LAND USE

As of 2000 there were 576 property owners with permanent addresses in the Bennett Valley Study Area according to Metroscan's report of assessor's data. Residential development occurs mostly near the center of the Study Area along Sonoma Mountain Road. Two notable exceptions

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are the Bennett Ridge and Ponderosa subdivisions. Ponderosa has the highest housing densities in the Study Area. A map of structures visible in aerial photography illustrates this (Plate 20) Most of the hillsides are too steep for development but ridge top homes do occur on the southern ridge of Bennett Peak (Bennett Ridge) and the northwest ridge of Sonoma Mountain. Housing density varies greatly within the Study Area as can be seen in the density distribution map shown on Plate 21.

4.8 HISTORIC RESIDENTIAL USE

As a basis of illustrating residential growth, Kleinfelder compared the number of structures visible in aerial photographs from 2000 to the earliest complete coverage available. The dates and areas covered by historic aerial photographs of the Study Area are shown on Plate 22. The earliest photos for which nearly complete coverage is available were taken in 1971. There are 268 structures visible in these early photos. In 2000 there were 940. In the 29 years separating the two photos, 672 structures were constructed, a rate of 23 structures per year.

4.9 CURRENT RESIDENTIAL WATER DEMAND

On average, Northern California households use from ½ to 1 acre-foot of water per year. An acre-foot is slightly less than 325,829 gallons. If consumption rates in the Bennett Valley area are comparable, the 576 permanent households in the Study Area can be expected to use from 288 to 576 acre-feet (94 to 188 million gallons) of water per year.

4.10 HISTORICAL RESIDENTIAL WATER DEMAND

Increases in residential use are directly related to an increase in water demand. If water consumption has grown at a rate comparable to the increase in structures (8.65 percent per year) the total consumption has grown from between 75 and 150 acre-feet (24.4 and 48.8 million gallons per year in 1971 to the current rates noted above.

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4.11 FUTURE RESIDENTIAL USE TRENDS

PRMD estimates that the Bennett Valley Study Area is developed to about 69% of the maximum build-out allowable by zoning. The department estimates that 274 units can still be built, 135 of which will be single units on existing vacant lots and the remainder will be on lot splits. These numbers do not take into account the possibility of second units constructed on developed lots. PRMD cautions that the estimates are based on assessor files, which might undercount existing units and therefore undercount potential units.

If the remaining 274 potential units are developed, the total water demand will increase by as much as 274 acre-feet (89 million gallons) per year.

4.12 AGRICULTURAL USE

Active commercial agriculture is a significant activity in the Bennett Valley Study Area. Irrigated crops in the Study Area are almost exclusively recently planted vineyards. Analysis of aerial photographs indicates that, in addition to vineyards, there are a few acres planted with walnut orchards but these do not appear to be actively farmed. There are also many acres of non-irrigated pasture. The distribution of cultivated land is shown by crop type on Plate 23. In 2000, vineyards in the Bennett Valley Study Area occupied about 644 acres.

4.13 HISTORIC AGRICULTURAL USE

Until quite recently, agricultural land use in the Bennett Valley Study Area was primarily limited to cattle ranching, dairy farming, and walnut production. Aerial photography shows that in 1971 most of the land used today for vineyards was pasture or range and the dominant crop on cultivated land was walnut. At that time there were no vineyards in the Study Area apparent in aerial photographs.

4.14 CURRENT AGRICULTURAL WATER DEMAND

Sonoma County vineyards typically apply 4-acre-inches of water per year or less. At this rate the Bennett Valley vineyards apply 215 acre-feet (69.9 million gallons) of water per year. The

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actual source of this water is not presently known but is assumed to be from wells near the vineyards.

Water is also needed to supply the needs of Matanzas Creek Winery. The winery was established in 1977 and produces 35,000 cases of wine annually. About one third of the grapes used are grown in the Study Area. Water is required in the wine making process for washing grapes and cleaning equipment. According to PRMD, Matanzas Creek Winery uses about 1.54 acre-feet of water per year. PRMD's estimate is derived from calculations he made of evaluation of the winery's use permit.

4.15 HISTORIC AGRICULTURAL WATER DEMAND

Past crop production in the Bennett Valley Study Area used considerably less acreage than it does today. In the 1970s, the irrigated crops occupied far less acreage and, therefore, the water demand is thought to have been much less. However, The irrigation methods employed then required more water to meet plant demands than methods like drip irrigation that are used today. A reliable estimate of the amount of water used would require a more detailed understanding of the irrigation practices that were actually used.

4.16 FUTURE AGRICULTURAL TRENDS

There continues to be vineyard development in the Bennett Valley area and acreage of suitable size and character is still available in the Study Area. If market trends continue to favor high-end varietal wines from Sonoma County, future development of vineyards in the Bennett Valley Study Area can be expected.

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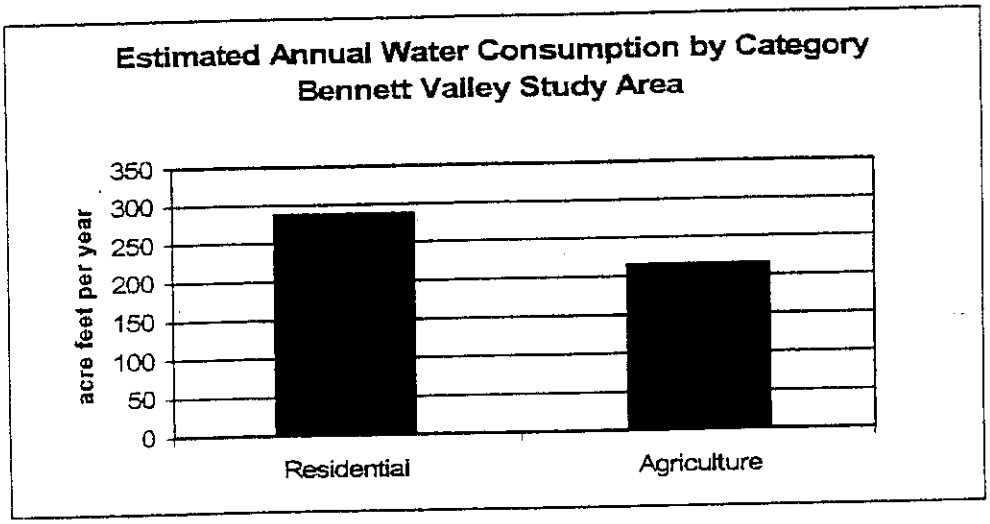
4.17 COMPARATIVE WATER USE

A comparison of water use within the Study Area is shown by category on the chart below:



4.18 GEOLOGIC CONSTRAINTS

The most significant constraint on the availability of groundwater in the Bennett Valley Study Area is the concentration of groundwater users on the poor aquifer materials of the Petaluma Formation. The formation consists mostly of fine-grained materials that offer very poor yield to wells. The successful wells in the Petaluma Formation are those that intersect the few beds of sand gravel or cobble.

The limited water-bearing capacity of the Petaluma Formation is significant because a considerable percentage of the residential and agricultural land use in the Study Area occurs on the Petaluma Formation as shown on Plate 24. The Petaluma Formation occupies 32 percent of the Study Area; yet, it contains 41 percent of the structures and 50 percent of the vineyard acreage. This unbalanced distribution is probably because slopes within the Petaluma are generally less steep than in the Sonoma Volcanics and are therefore more accessible.

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Water availability is problematic in the Petaluma Formation. Kleinfelder questioned a number of Bennett Valley residents and community leaders about water availability problems within the Study Area. They reported a number of well failures, wells that go dry seasonally, and properties where sufficient water supplies could not be developed (The interviewees asked that Kleinfelder keep the location of affected properties confidential). A number of residents reportedly supplement their well water supplies with truck deliveries or store water for use during dry months. Without exception, all the properties mentioned are located on the Petaluma Formation.

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5. STATISTICAL EVALUATION OF WELL LOG DATA

5.1 OBJECTIVE

The overall objective of Kleinfelder's qualitative statistical analysis of well log data was to analyze and evaluate existing data to reveal any general trends in water supply from the aquifers.

5.2 DATA SOURCE

Kleinfelder used data from driller's well logs obtained from the California Department of Water Resources. The data set is derived from the Department's collection of digitized logs for wells drilled in California. With the assistance of PRMD, Kleinfelder made a formal request to the Department for digital copies of the logs representing wells in Sonoma County. The department supplied the requested information on three CDs. The logs are stored as images in TIFF format indexed by image number. The Department also supplied a Microsoft Excel spreadsheet and Access database that catalogs the images according to image ID, file location, log number, and the well's location relative to township, range and section. The collection includes logs from the middle 1940s to 1990 and a few logs from the late 1990s. Data obtained for each Study Area cover the following time periods:

- Bennett Valley (1941 to 1997).
- Mark West (1942 to 1997).
- Joy Road (1953 to 1997).

The data sets do not include many logs from 1990 to the present because the Department of Water Resources has not cataloged them. It is important to note that the collection does not include logs for wells with undetermined locations or wells for which no log was submitted.

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5.3 APPROACH

A combination of graphical and quantitative statistical techniques was employed to characterize and compare reported depth-to-water (DTW) and total well depth data for individual wells installed within a given Study Area. The statistical methodology employed includes four main elements:

- Data Set Preparation
- Initial (*a priori*) Data Screening
- Outlier Testing
- Graphical Trend analysis

5.4 DATA SET PREPARATION

Depth-to-water and total well depth data were obtained directly from well drillers logs, entered into a Microsoft Access database and downloaded into Microsoft Excel to form data sets suitable for statistical analysis. The data sets are included in Appendix C. After the database was completed, a manual check of 10 percent of the data records in each data set was performed. The data sets include 599 logs of wells in the Joy Road Study Area, 246 logs of wells in the Mark West Study Area, and 530 logs of wells in the Bennett Valley Study Area.

5.5 INITIAL (*A PRIORI*) DATA SCREENING

The goal of the initial (*a priori*) data screening process was to identify, isolate and remove unwanted, irrelevant, and unusable data from each data set. For example, 13 records (1 Joy Road and 12 Bennett Valley records) with depths to water values of "0" were removed. Zeros were used for wells where water flowed freely from the casing. Allowing the water to flow out of the casing relieved the pressure head. If there had been a casing above ground surface, the water level would have risen and actual values could have been determined. Because it was not, these values serve no useful purpose in the statistical analysis. No other data values were removed from the data sets during this phase of analysis.

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5.6 OUTLIER TESTING

Statistical outlier tests give the analyst probabilistic evidence that an extreme value (potential outlier) does not "fit" with the distribution of the remainder of the data. These tests are used to identify data points that require further investigation to determine if they should be discarded or corrected.

Outliers in well data sets may result from various sources including, but not limited to:

- Legitimate, but unusually high natural values.
- Physical obstruction in the well during measurement.
- Error associated with the measurement of depths.
- Data transcription or coding errors involving decimal places or units of measurement.

In this study, if a data point was found to be an outlier, it was automatically discarded from the data set. Depth-to-water and total well depth data were screened by visually examining a spreadsheet column of sorted concentration values and/or by visual examination of the temporal plots. Excessively high values (values that are a factor of five times higher than their nearest neighbor value) were evaluated using the robust Grubbs (Tn) Outlier Test. This test is appropriate for both parametric and nonparametric data sets (Grubbs and Beck 1972, ASTM 1994).

Grubb's test assumes that the parent population follows a normal distribution. In the Grubb's test, the data is sorted by rank order and the mean and standard deviation is calculated. The test statistic is calculated as:

$$T_n = \frac{(X_n - \overline{X})}{s}$$

Where:

Xn	=	Concentration of data point n
Tn	=	Test statistic
$\overline{X}$	=	Arithmetic average of the data
s	=	Standard deviation of the data set

The test statistic (Tn) is then compared to the appropriate tabled one-sided critical value (Tc), which depends on n and the chosen level of significance. If the Tn > Tc this is statistical

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evidence that the data point is an outlier. Alternatively, the equation is rearranged and Tc is used to calculate a critical concentration value (Xc) above which a data point may be an outlier:

$$X_c = T_c \bullet S_d + \overline{X}$$

If a data point was determined to be an outlier by this methodology, it was investigated for typographic, sampling or analysis errors.

5.7 GRAPHICAL TREND ANALYSIS

There are no proven "automatic" techniques to identify trend components in the time series data; however, as long as the trend is monotonous (consistently increasing or decreasing) that part of data analysis is typically not very difficult in a qualitative sense. Many monotonous time series data can be adequately approximated by a linear function. However, seasonal dependency (seasonality) is a general component of the time series pattern for water level behavior. For example, the average rainfall has been consistent in the last half century but it varies from year to year.

Depth-to-water and total well depth data for each of the three study areas were plotted with respect to time. Many wells were constructed in most of the years. Information regarding the location of each well and intended use of that well were not consistently available but variation due to these factors is to be expected. Because the goal is to represent general groundwater conditions of the study area as a whole, the mean and 95% confidence limit of the mean of data from all wells drilled each year were plotted rather than individual data values. Plotting the mean is also useful for the ease of presentation. A linear regression line and associated regression bands representing 95% confidence intervals were fitted to each data set. The slope of this line and the variability of the data in a given year were analyzed graphically.

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5.8 DEPTHS TO WATER TREND

Two trends are apparent in depths-to-water in new wells, a short-term response to precipitation and a long-term decline in depth to water. In each of the three study areas, the mean depth to water in new wells drilled each year varies from year to year. The variation appears to be correlated with variation in precipitation. This can be seen by plotting precipitation and the mean depth-to-water in new wells together on a single graph. See Figures 1 and 2. These plots show that the mean depth-to-water in new wells generally corresponds to the amount of precipitation from the preceding year. While this is generally true, there are data points from each data set that do not conform to this relationship and demonstrate that other variables are also at play.

The mean depth to water in new wells trends downward in each study area. In the Joy Road Study Area, the mean trend drops from about 20 feet below surface in 1955 to about 42 feet in 1990 (Figure 3). The trend in the Mark West Study Area drops from about 90 feet in 1950 to about 175 in 1997 (Figure 4). In Bennett Valley the trend drops from about 42 feet below surface in 1950 to over 100 feet below surface in 1997(Figure 5).

Over the period of matching data, the precipitation trend does not match the trend of mean depth-to-water in new wells. From the 1940s to the late 1990s, the trend in total annual precipitation measured in stations near the Study Areas has been nearly level with a slight increase. Over the same period, the mean depth to water in new wells has deepened over time in all three-Study Areas. On the basis of this relationship, it can be said that the downward trend in water levels is not due to changing weather conditions.

The downward trend in depth-to-water in new wells corresponds to the trend of overall development but not at the same rate. Depth to water in new wells has deepened in each of the three Study Areas since the 1940s. At the same time, the rate of growth, as represented by the number of structures and cultivated acreage, has greatly increased. The nature and rate of development has been different in each of the Study Areas; but, in every case it is far greater than the rate of declining depth to water in new wells. The most extreme example is residential growth in the Mark West Study Area. Since 1951 the number of residences in the Study Area

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has increased by at least 2000 percent. In the same period, the mean depth to water in new wells has deepened by a little less than 100 percent. Such a marked difference between the rate of increase in water consumption and the rate of lowering average water levels in new wells suggests that the effect of increased extraction on water levels is being buffered by annual recharge from precipitation.

5.9 DEPTH OF WELLS TREND

There is a clear trend of increasing average well depths over time. This is evident in each of the three Study Areas. The average depth of wells drilled in the Joy Road Study Area has increased from about 50 feet in 1955 to over 140 feet in 1990 (Figure 6). In the Mark West Study Area the average depth of new wells has increased from about 120 feet in 1950 to about 300 feet in 1997 (Figure 7). The average depth of Bennett Valley wells has increased from about 150 feet in 1940 to about 350 in 1990 (Figure 8).

The trend seems to reflect lower water levels not improvements in drilling technology. There has been some suggestion that the deepening trend in the depths of wells is more indicative of changing technology than it is of changing groundwater conditions. The data do not support this view. The mean depth of new wells parallels the mean depth to water (Figures 9 and 10). Wells are shallower in wet years, when water levels are high, and deeper in dry years. This suggests that drillers, acting rationally, drill only as far as necessary to meet the design objectives. The data indicate that drillers go only as deep as necessary regardless of the equipment used.

In the Mark West and Bennett Valley Study Areas, the trend may also reflect a migration of drilling sites from low-lying valley sites to higher elevations and ridge tops. If for example all early wells were in the valleys and over time the drilling sites were at progressively higher elevations, the increase in depth of wells would correlate more with elevation than with time. Because we do not know the exact location of each well, we do not know if there is a pattern of drilling at higher elevations or not. It seems improbable though that drilling has proceeded systematically from lower to higher elevations. Its is more likely, however, that drilling did first occur at lower elevations in association with early agricultural use, but that, as more wells were

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drilled, there has been a mix of both low lying and higher elevation sites. The location of each well in the data set and further analysis of the data would be needed to evaluate the potential correlation between well depth and elevation over time.

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6. CONCLUSIONS

1. Geologic Conditions Are The Principal Constraint On The Availability Of Groundwater

Water availability is limited in all water scarce areas of the county but it is particularly scarce in geologic materials such as the Franciscan and Petaluma formations. The composition and hydrologic characteristics of these formations and the nature of the materials in them limit key aquifer characteristics such as recharge potential, water storage capacity, and the ability of the formation to yield water. Or, in other words, these factors determine how much water gets into the formation, how much water it can hold and how freely water flows from it.

These poor aquifers have insufficient storage to supply some residents through the dry months of the year. In some areas, residents must supplement their water supply by trucking water to their homes. This is evidenced by the frequent presence of water trucks on the roads of the Joy Road and Bennett Valley Study Areas in the late summer months.

2. Changes In The Depth To Water In New Wells Are Trending Downward

An analysis of the annual average depth to water in new wells shows a trend over time of decreasing water levels in the three Study Areas. From year to year, the average depth to water in new wells appears to reflect changes in precipitation. But, unlike the precipitation trend, which has been relatively flat over time, the depth to water is trending toward deeper water levels.

The data suggest, as a general trend, that static water levels in new wells occur at deeper levels over time. But, the data do not show whether water levels in existing wells are dropping nor do they account for the possibility that new development is occurring in areas with more marginal groundwater conditions. Further study would be needed to evaluate the conditions in individual

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wells for evidence of change over time and to evaluate the relationship between those conditions and the well's location relative to geology, topography and competing groundwater uses.

3. The Trend In Depth To Water In New Wells Shows Evidence Of An Overdraft Condition

Overdraft occurs when more water is taken from an aquifer than is replaced. The result of overdraft on an aquifer is the dropping water levels. Analysis of well logs shows that the average depth to water in new wells drilled each year is increasing indicating that water levels are dropping. Lowering water levels reflect either decreased input or increased outflow. Input to the Study Areas is almost exclusively from precipitation, which does not appear to have decreased. The trend line on a plot of annual rainfall since 1950 is nearly flat with a very slight increase. The change in water levels is, therefore, most likely due to a decrease in recharge rates, an increase of groundwater extraction, or a combination of both. The most likely explanation is that groundwater extraction has increased.

The trend analysis of depth to water in new wells together with reports of dropping water levels, seasonal well failures, and complete well failures all suggest overdraft conditions. However, comparison of the actual volume of groundwater extracted with reliable estimates of annual groundwater recharge would be needed to determine if overdraft conditions actually exist. Determination of the actual volume of water extracted would require monitoring of total volume of water produced by a representative number of wells in each Study Area.

4. Lower Depths To Water In New Wells Correlates With Development

The change in average depth to water in new wells appears to be correlated to development, primarily residential. There may be many reasons for increased outflow but the most significant change since 1950 is increased groundwater extraction from wells. In the Joy Road and Mark West Study Areas, this increase is mostly from residential development. In the Bennett Valley Study Area it is from both residential and agricultural development.

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5. Additional Development Will Likely Increase Overdraft

There is a potential for further residential and agricultural development in the Study Areas because they have not been developed to the maximum density allowed by existing zoning ordinances. New homes and vineyards require water and more wells would be needed to meet demand. Additional groundwater extraction is likely to increase the rate of overdraft and result in further decline of groundwater levels. In fact, if an overdraft condition currently exists, groundwater levels may continue to decline even if no additional extraction occurs. Levels will continue to drop as long as extraction exceeds recharge.

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7. QUESTIONS FOR FURTHER STUDY

Evaluation of development proposals or regulation of groundwater use requires a detailed understanding of groundwater conditions. However much of the needed information is not currently available. Existing regulations and ordinances provide groundwater information when a project is proposed but no ongoing monitoring of conditions is required. People building homes in water scarce areas of the county are required to establish a water supply of at least 1 gallon per minute and construct adequate storage. Industrial and commercial developers are required to conduct groundwater availability studies to demonstrate that enough groundwater is available to meet their proposed needs without adversely affecting supply to existing users. However, once a home or facility is built the long term cumulative affect on groundwater conditions is not monitored.

This study has shown that groundwater conditions are changing in the Study Areas and that there are geologic, physiographic, and competitive constraints on the availability of groundwater. In the Joy Road and Bennett Valley Study Areas, water supply problems are evident. The groundwater resources in these areas may not be sufficient to fully supply the existing users, yet further demand on these resources can be expected with new development. And, while some areas are experiencing declining water levels or suffering yearly shortfalls, other areas may have enough groundwater to supply more than current needs.

Development of regulations or control of groundwater use should be based on the answers to four basic questions:

- What are the groundwater conditions now?
- What are the capabilities of the aquifers?
- How are conditions changing over time and what is the significance of those changes?
- What is responsible for the change?

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While this study provides some information on each of these questions, groundwater conditions are not fully understood at the present time. To fully answer these questions we need to know:

- What are the static and pumping water levels in existing wells?
- How much water is being used?
- Where is it being produced?
- Where is it being used?
- What is it being used for?
- How much water is available in storage?
- How much water can be produced without further decrease in water levels?
- How much water can be produced without threat to neighboring wells?
- How are conditions in individual wells changing with time?

With answers to these questions the County can:

- Establish actual groundwater conditions.
- Understand water consumption rates and patterns.
- Assess the effect of water conservation measures.
- Evaluate changes over time.
- Calculate sustainable extraction rates.
- Evaluate the impact of proposed extraction increases.
- Locate undeveloped or underutilized groundwater resources.

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8. RECOMMENDATIONS FOR FURTHER STUDY

Providing answers to the questions discussed in Section 7 will require further study including additional research and fieldwork. Development of a scope of work should be a collaborative effort between the groundwater users in the study area, County planning, permitting and policy staff, and groundwater scientists. A separate scope should be tailored to reflect the unique physical conditions and address the perceived problems and future needs of each study area. In general, further study can be expected to consist of the following tasks:

Task 1: Establish Current Groundwater Conditions and Refine Conceptual Model of Aquifer:

- Prepare Work Plan and Task Schedule
- Survey Reported Groundwater Problems and Well Failures
- Identify Test Wells and Obtain Access Permission
- Measure Depth to Water in Wells
- Calculate or Estimate Run-off
- Test or Obtain Groundwater Chemistry
- Integrate Data with GIS based Data Management System.
- Refine GIS Maps of Land Use and Geology
- Prepare Technical Memorandum on Baseline Conditions

At the completions of Task 1, the scope of work can be further refined to meet the specific needs and conditions within each study area. Further assessment may include elements of the following tasks.

Task 2: Determine Aquifer Characteristics

- Prepare Work Plan and Task Schedule
- Conduct Aquifer Tests
- Prepare Technical Memorandum on Aquifer Characteristics

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Task 3: Monitor Groundwater Conditions Over Time

- Prepare Work Plan and Task Schedule
- Identify Test Wells and Obtain Access Permission
- Install Monitoring Equipment
- Collect Well Data Quarterly
- Measure and Record Precipitation
- Measure or Calculate Run-off
- Integrate Data with GIS based Data Management System
- Prepare Quarterly Report of Groundwater Conditions

Task 4: Develop Groundwater Model

- Identify critically impacted areas
- Locate undeveloped groundwater resources
- Calculate Maximum Extraction Rates

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9. LIMITATIONS

Kleinfelder prepared this report in accordance with generally accepted standards of care, which exist in Sonoma County, California at this time. It should be recognized that definition and evaluation of geologic and environmental conditions is a difficult and inexact art. Judgments leading to conclusions and recommendations are generally made with an incomplete knowledge of the subsurface conditions present. More extensive studies, including subsurface investigations, may be performed to reduce uncertainties. If the County of Sonoma wishes to reduce the uncertainties of this investigation, Kleinfelder should be notified for additional consultation. No warranty, expressed or implied, is made.

This report may be used only by the client and only for the purposes stated, within a reasonable time from its issuance. Land use, site conditions (both on- and off-site) or other factors may change over time, and additional work may be required. Any party other than the client who wishes to use this report shall notify Kleinfelder of such intended use by executing the "Application for Authorization to Use" which follows this document as an Appendix. Based on the intended use of the report, Kleinfelder may require that additional work be performed and that an updated report be issued. Non-compliance with any of these requirements by the client or anyone else will release Kleinfelder from any liability resulting from the use of this report by any authorized party.

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10. REFERENCES

ASTM E 178-94 1994. Standard practice for dealing with outlying observations. American Society for Testing and Materials, Philadelphia, PA.

Ford, Robert S. 1975. Evaluation of Ground Water Resources: Sonoma County. California Department of Water Resources. Bulleting 118-4

Grubbs, F.E., and G. Beck. 1972. Extension of sample sizes and percentage points for significance tests of outlying observations. Technometrics 14:847-854.

Sonoma County Planning Department. 1974, Joy Road Plan.

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FINAL
Inventory Project Report
Outer Landing Field, Cotati
Sonoma County, California
DERP/FUDS Site No. J09CA7470

Contract No. DACW05-95-D-0004
Task Order No. 0020

September 1999

Prepared For:

Department of the Army
Corps of Engineers
Sacramento District
1325 J Street
Sacramento, California 95814

Prepared By:

TechLaw, Inc.
300 Union Boulevard
Suite 600
Lakewood, Colorado 80228

FOR
DERP-FUDS SITE NO. J09CA770
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

SITE NAME: This site currently consists of a theater, apartments, retail stores, office buildings, a bank, restaurants and a trailer park. The site was previously known as the Naval Auxiliary Air Facility, NAAS Santa Rosa, Outer Landing Field, Cotati, and Air Facility, Cotati, California.

LOCATION: Outer Landing Field, Cotati (OLF Cotati) is located approximately five miles south of Santa Rosa, ten miles north of Petaluma and forty miles north of San Francisco at a latitude of 38°21' Longitude of 122° 43' (SB0217). This 216.95 acre parcel had an access road running north and south which parallels US Highway 101. According to the Sonoma County Assessor's Map the former OLF Cotati consists of Parcels 04 and 39 (CA0155 and CA0156).

SITE HISTORY: A memorandum dated November 21, 1944 states that Cotati NAAS for 218.25 acres was acquired in fees by condemnation. On June 16, 1943, a Declaration of Taking was filed between the United States of America and The Cotati Company, a corporation, Fred W. Rohnert and Edna V. Rohnert for 74.85 acres more or less. TechLaw was able to obtain the Final Judgment of Condemnation for 74.85 of the acres dated October 20, 1943 (CA0253 and SB0109); however, was unable to obtain a Declaration of Taking for the remainder.

According to a General Layout Map of the Cotati Air Facility under the Naval Air Center, Alameda, California dated September 29, 1944, the field contained an Operational and Control Tower, fire and crash truck garage, 2-25 gallon gasoline storage, an oil storage building, a well and tanks, pump house, a small arms magazine and a machine gun range (CE0349). Confirmation of this information is contained in the Appraisal of Real Estate dated May 26, 1958, which states that the above listed items were located on the facility; however, it also shows that the facility had an underground storage tank evidenced by photographs taken during the appraisal (SB0372). A Memorandum dated February 4, 1949 from the Commander, Naval Air Bases, Eleventh and Twelfth Naval District states that Cotati was designated as an outlying field of Naval Air Station, Alameda, California, and was in inactive status. The facility consisted of runways, a tower, and a couple of small shacks. The arable lands were under a lease for agricultural purposes and the Sonoma County Peace Officers' Association used the rifle range under a permit (SB0100). TechLaw was unable to obtain any of the permits or leases regarding the rifle range.

Lease NOy (R)60649 for 95 acres was granted to M. J. Azevedo for the purpose of growing hay. The term of Lease was extended for a period of one year commencing September 1, 1956 and ending August 31, 1957 (SB0400, SB0401, SB0408, SB0410 and SB0412).

A Naval Speed letter dated February 16, 1956 states that the former OLF Cotati was reported excess and provides no actual disposal date (SB0420). However, a letter from the Twelfth Naval District state that the property has been declared excess and is being referred to the Bureau of Yards and Docks for

screening action by all Federal Agencies. At the conclusion, it will be transferred to General Services Administration (GSA) for disposal (SB0419). Additionally, a Naval Speed letter dated February 27, 1956, estimated a target date for reporting to GSA should be June 1, 1956 (SB0418).

In a letter dated November 15, 1957, the California Research Corporation requested a license covering the use of runways located at the former Outer Landing Field, Cotati for road testing purposes (SB0395). Lease NOy (R) 54080, which consisted of 35.3 acres was approved for a period of one year from December 1, 1957 to November 30, 1958 (SB0392).

According to Lease (NOy (R) 50272) and under Resolution No. 4997, the City of Santa Rosa used the former Navy outlying field airstrip for purpose of drag racing (SB0391, SB0407, SB0414). The Lease for the 95 acres for use of airstrips by the City of Santa Rosa was canceled January 31, 1957 (SB0402).

A letter from the Twelfth Naval District states that the property has been determined by GSA to be surplus to the needs of the Federal Government. However, GSA agreed to defer disposal action until after 1 July 1957 (SB0398).

According to an Appraisal of Real Estate dated May 26, 1958, the property consisting of 21.66 acres was conveyed by the United States Government on July 21, 1958 to Michael C. Callen by Deed recorded on September 18, 1958 (SB0387 and SB0390). Currently, the property is owned by Codding Enterprises, which is a property management company. The property consists of a theater, retail stores, bank, restaurants, a trailer park, apartment buildings, and office buildings.

SITE VISIT: A site visit was conducted on June 11, 1999 to observe current conditions of the site and to identify features of the site as they relate to DoD activities. Betty Henkle and Steve Cowen of TechLaw conducted the site visit.

TechLaw personnel arrived at the former Outer Landing Field, Cotati at approximately 11:00 am. The area consists of Rancho Verde Mobile Home Park to the north, theater, bank, restaurants, office buildings and retail stores to the south and an apartment complex to the east (Photograph 1, 2, and 3).

TechLaw personnel met with Mr. Hugh Codding, of Codding Enterprises, owner of the property that contained the former OLF, Cotati. He confirmed that the field was used by the Navy during WWII and stated that he used to fly his small plane into the former landing field in the 1950s while it was being utilized for drag racing and road testing. TechLaw personnel asked if he knew if there were any underground storage tanks or evidence of ordnance on the property. Mr. Codding was unaware of any underground storage tanks or any evidence of ordnance.

TechLaw was unable to obtain any information from other agencies regarding underground storage tanks prior to the submitting of the draft report. However, if any information is obtained, it will be submitted with the Final Report.

As a result of the site visit conducted at the former OLF, Cotati, the following conclusions have been developed:

- The site currently consists of a theater, apartments, retail stores, office buildings, a bank, restaurants and a trailer park.
- The site is accessible to the public.
- The 2-25 gallon gasoline storage that existed on the former OLF, Cotati were above ground tanks and TechLaw is not sure of the operations pertaining to the oil storage building and no physical evidence exists.
- Documented evidence shows that the former OLF, Cotati contained a small arms magazine storage, a machine gun range, and an underground gasoline storage tank.
- According to the Appraisal of Real Estate dated May 26, 1958, the well, gasoline distribution system, gas, water, electrical and sewage disposal systems were all assumed by reason of observation, to have been damaged or removed. However, at the time of this draft report, no information was available from any other agencies.

CATEGORY OF HAZARDS: OE, CON/HTRW

PROJECT DESCRIPTION: There are two potential projects at this site.

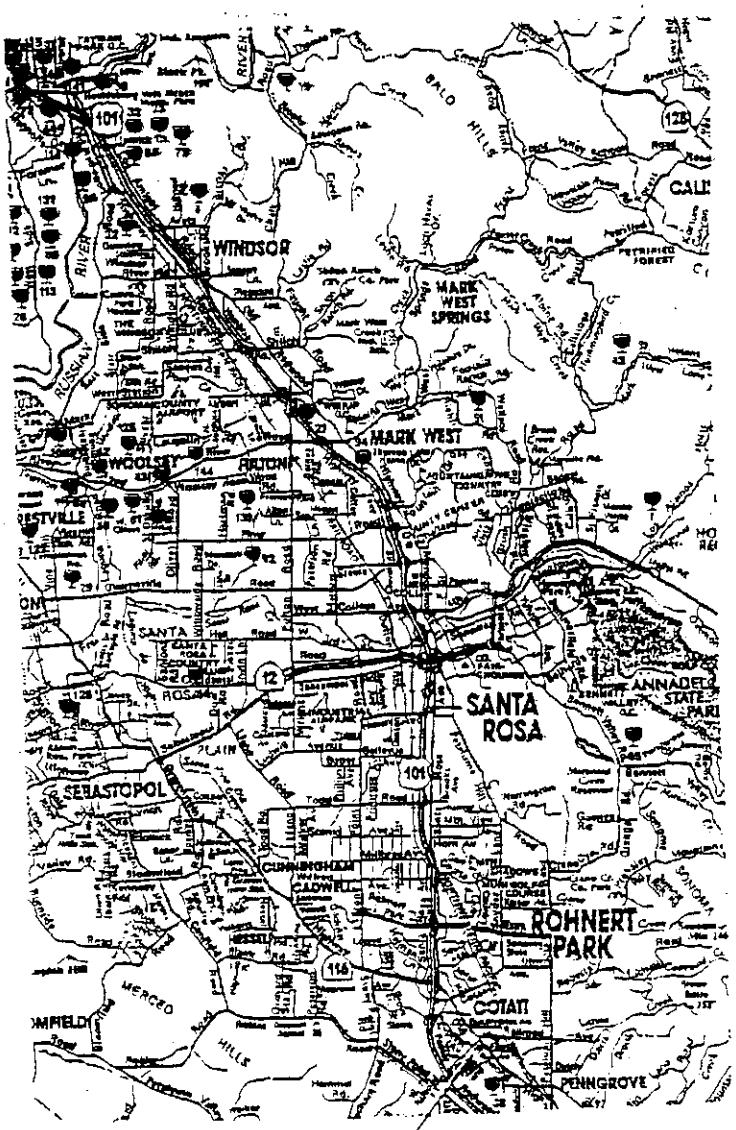
a. OE. Evidence indicates that this site was used to store ordnance. A project is recommended to locate any waste sites which may contain any unexploded ordnance.

b. CON/HTRW. Evidence exists that the site included an underground gasoline storage tank. A project is recommended to locate the underground storage tank using ground-penetrating radar and magnetic surveys. Remove and dispose of an underground storage tank and test soil beneath the tank for possible contamination.

AVAILABLE STUDIES AND REPORTS:

Historical documents obtained from the Pacific Sierra National Archives in San Bruno and the U.S. Army Corps of Engineers, Sacramento District. A list of documents referenced in the report is attached.

POC: Mr. Bill Mullery, U. S. Army Corps of Engineers, Sacramento District, (916) 557-6944.



Outer Landing Field, Cotati

Site location in California

Figure 1

LEGEND

Site location map of
Outer Landing Field, Cotati

SOURCE: Compass Maps, Inc.

TechLaw, Inc.

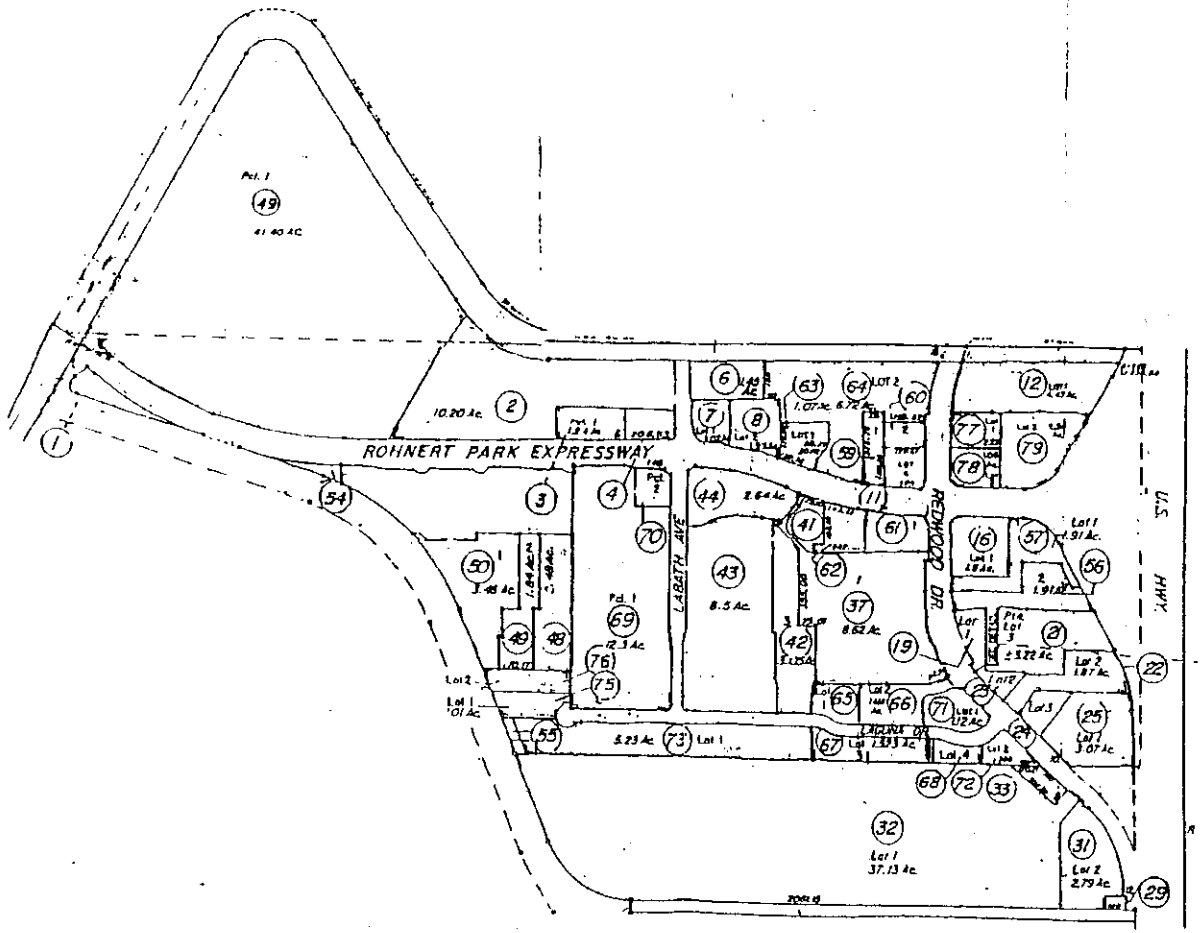


Figure 2

LEGEND

Map depicting all the properties of the Former Outer Landing Field Cotati

SOURCE: Sonoma County Assessors Office

TechLaw, Inc.

Outer Landing Field, Cotati
List of References

Reference No.	Date	Title	Author	Author	Source	Reference No.
CA0155	01/01/1901	Map titled "County Assessor's Parcel Map, Book 143, Page 04, Sonoma County".	Not indicated	Not indicated	County Assessor's Office, Sonoma County	
CA0156	01/01/1901	Map titled "County Assessor's Parcel Map, Assessor's Map Book 143, Page 39, Sonoma County".	Not indicated	Not indicated	County Assessor's Office, Sonoma County	
CA0253	10/20/1943	Final Judgment of Condemnation for 74.85 acres to the United States of America and The Cotati Company	Welsh, Martin I.	U.S. District Court	County Recorder's Office, Sonoma County, CA	Book 592, page 39
CE0349	09/29/1944	Map titled "Naval Air Center Alameda, Air Facility, Cotati General Layout". Drawing No. 1273.	Nichols, Madison	Public Works Office	USACE, Sacramento Division	
SB0100	02/04/1949	Letter listing status of Air Base activities.	Springmeyer, L.F.	Naval Air Bases, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG 181, Records of Naval Districts and Shore Establishment-12th Naval District Airbases, Re Acquisition Files, Box No. 4 of 4, Accession No. NN373-91 (181-61-0096), Folder titled, "NA/Miscellaneous Air Facilities 9/45-12/58."
SB0109	11/21/1944	Memorandum containing summary of information on land acquisitions and Real Estate.	Stephens, Albert Lee	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG 181, Records of Naval Districts and Shore Establishment-12th Naval District Airbases, Re Acquisition Files, Box No. 4 of 4, Accession No. NN373-91 (181-61-0096), Folder titled, "NA/Miscellaneous Air Facilities 9/45-12/58."
SB0217	07/13/1943	Flight Control Map of NAAF Cotati, CA.	Not indicated	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG181, Records of Naval Districts and Shore Establishments, Public Works, 12 Naval District, Engineering Drawings of Airbase and Airstation Facilities, Accession No. NN373-91 (181-60-641)."Roll #1 (Maps)."
SB0372	05/26/1958	Appraisal of 216.95 acre parcel of land known as the Naval Outlying Field, Cotati.	Jordan, Edwin F.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 121, Box No: 6, Accession No: 9 NSS-121-87-001
SB0387	01/01/1901	Valuation Report to provide allocations of value for portions of the Naval Outlying Field at Cotati.	Robertson, Norman R.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 121, Box No: 6, Accession No: 9-NSS-121-87-001
SB0390	01/01/1901	Letter stating the inclosure of one quitclaim deed for the Naval Outlying Field at Cotati. Includes quitclaim deed.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0391	05/19/1958	Letter stating the inclosure of a license for use of the airstrip at the former Navy Outlying Field at Cotati and if acceptable have it executed on behalf of the City of Santa Rosa.	Springmeyer, L.F.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

Outer Landing Field, Cotati
List of References

Record	Docdate	Doctitle	Author	Authorg	Source	Reference No
SB0392	01/01/1901	Letter to a research corporation stating that the fully executed license NOy(R)-54080 covers the use and occupancy of two runways at the former Naval Outlying Field at Cotati. Includes license.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0395	11/15/1957	Letter stating a license covering the use of runways on subject facility has been prepared. Includes a letter from research corporation requesting a license to use the abandoned airstrip at Cotati.	Springmeyer, L.P. Cooley, John L.	District Public Works, Twelfth Naval District California Research Corporation	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0398	05/27/1957	Letter stating that the General Services Administration has agreed to defer disposal action on the property until after 1 July 1957.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0400	01/14/1957	Letter concerning the extension of a lease covering use of approximately 95 acres of land at NAAS Cotati.	Wright, L.C.	Bureau of Yards and Docks	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0401	01/03/1957	Letter stating the enclosure of third amendment to lease NOy(R)-60649.	Valentine, W. J.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0402	12/28/1957	Letter stating that the Department of the Navy is in the process of transferring the Navy Outlying Field, Cotati to the General Services Administration for disposal.	Gardiner, A.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0407	10/08/1956	Letters giving reference to a condition report requested by the District Public Works Officer regarding OLF Cotati. Includes resolution No. 4997 and Condition Report.	Turner, Frank Springmeyer, L.P. Jensen, H. A. Maxwell, Richard B.	Naval Air Station, Alameda, CA District Public Works, Twelfth Naval District Mayor, City of Santa Rosa Office of the City Attorney	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0408	09/25/1956	Letters stating that terms of lease expires 31 August 1956. Includes request for an extension of terms for one year beginning 1 September 1956.	Valentine, W. J. Springmeyer, L.P.	District Public Works, Twelfth Naval District District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0410	09/05/1956	Naval Speedletter informing of approved lease extension beginning 1 September 1956 and of project to dispose of station. Includes Route Sheet No. NASA 226.	Wright, L.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

Outer Landing Field, Cotati
List of References

Reference	Date	Title	Author	Affiliation	Source	Reference No.
SB0412	08/20/1956	Letter requesting approval from the Bureau of Yards and Docks to extend lease for a one year period. Includes one indorsement.	Redman, John R. Gardiner, A.P.	Twelfth Naval District District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0414	07/18/1956	Letter requesting a permit license for the use of OLF Cotati as a "Drag Strip".	Hood, Samuel B.	City of Santa Rosa	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0418	02/27/1956	Naval Speedletter concerning the screening of subject property and the status of disposition.	Martindill, D. R.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0419	02/23/1956	Letter giving information concerning requests for use of the former Naval Outlying Field at Cotati.	Gardiner, A.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0420	02/16/1956	Naval Speedletter states numerous requests for outleasing runways have been received.	Springmeyer, L.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM
FORMERLY USED DEFENSE SITES
FINDINGS AND DETERMINATION OF ELIGIBILITY

OUTER LANDING FIELD COTATI
SONOMA COUNTY, CALIFORNIA
DERP-FUDS SITE NO. J09CA7470

FINDINGS OF FACT

1. A memorandum dated November 21, 1944 states that 218.25 acres of land was acquired in fee by condemnation to form the Outer Landing Field Cotati. On June 16, 1943, a Declaration of Taking Civil No. 4607 was filed between the United States of America and The Cotati Company, a corporation owned by Fred W. Rohnert and Edna V. Rohnert for 74.85 acres, more or less. Although the Final Judgment of Condemnation for 74.85 acres dated October 20, 1943 was obtained; the condemnation for the remainder of the 218.25 acres was not located.

2. The property was designated as an outlying field of Naval Air Station, Alameda, California. The airfield contained an Operational and Control Tower, fire and crash truck garage, 2-25 gallon gasoline storage containers, an oil storage building, a well and tanks, pump house, a small arms magazine and a machine gun range. Additionally, the Appraisal Report states there was a gasoline distribution system and a photograph is included in the report showing the top of an underground oil storage tank. It is unclear what type of operations were conducted in the oil storage building.

3. A Naval Speed letter dated February 16, 1956 states that the former OLF Cotati was reported excess, but does not provide the actual disposal date. A Naval Speed letter dated February 27, 1956, estimated a target date for reporting to GSA as June 1, 1956. According to an Appraisal of Real Estate dated May 26, 1958, the property consisting of 216.95 acres was conveyed by the United States Government on July 21, 1958 to Michael C. Callen by Deed recorded on September 18, 1958.

DETERMINATION

Based on the foregoing findings of fact, the site has been determined to be formerly used by DoD. It is therefore eligible for the Defense Environmental Restoration Program-Formerly Used Defense Sites established under 10 USC 2701 et seq.

27 Sep 99
DATE

FOR PETER T. MADSEN
COLONEL (P), U.S. ARMY
COMMANDING

PROJECT SUMMARY SHEET
FOR
DERP-FUDS OE PROJECT NO. J09CA7471
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

PROJECT DESCRIPTION: Evidence shows that DoD used the site as an airfield during World War II. The site contained a small arms magazine storage and a machine gun range. While there have been no reports of ordnance being found on this site, there is still the possibility that ordnance was buried over time. The site is heavily used by the public.

PROJECT ELIGIBILITY: The site was used by DoD as an airfield during World War II.

POLICY CONSIDERATION: There is no policy applicable to this project.

PROPOSED PROJECT: This site should be further evaluated for unexploded ordnance and should be referred to CEHND for recommendations on further action.

RAC FORM: Attached.

POC: Mr. Bill Mullery, U.S. Army Corps of Engineers, Sacramento District, (916) 557-6944.

PROJECT SUMMARY SHEET
FOR
DERP-FUDS CON/HTRW PROJECT NO. J09CA747002
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

PROJECT DESCRIPTION: An underground storage tank exists on the former OLF, Cotati according to an Appraisal of Real Estate dated May 26, 1958. Evidence shows that DoD used the site as an airfield during World War II. The site contained an underground oil storage tank and a gasoline distribution system according to the documentation and the photographs provided with the appraisal. The site is heavily used by the public and may pose a hazard to surrounding soil and groundwater.

PROJECT ELIGIBILITY: The underground gasoline storage tank and associated gasoline distribution system was installed and used by the DoD. They are a potential source of environmental contamination. Therefore, remedial actions are eligible for DoD funding.

POLICY CONSIDERATIONS: Although a portion of the property was used by parties other than DoD, the underground storage tanks and associated gasoline distribution system recommended for removal have not been used since DoD occupancy.

PROPOSED PROJECT: Definitively locate the oil storage tank and gasoline distribution system at the former OLF Cotati. Remove and dispose of tank and distribution system. Test the underlying soil to determine the extent and severity of any soil contamination. Dispose of contaminated soil and replace with clean imported fill.

COST ESTIMATE: Attached.

POC: Mr. Bill Mullery, U.S. Army Corps of Engineers, Sacramento District, (916) 557-6944.

Project Present Value Cost Summary Report

Project

Name: Outer Landing Field Cotati Sonoma County Ca.
ID: J09CA7470
Location: SANTA ROSA, CALIFORNIA
Description: Con/HTRW Evidence exist that the site included an underground gasoline storge tank. Aproject is recommended to locate the underground tank using GPR & magnetic survey. Remove and dispose of the UST and test the soil beneath the t

Site

Name: UST Removal
ID: 01
Type: Con/HTRW
Description: The site could contain at least one (1) 5000 gallon fuel storage tank. The tank will be removed and the site will be backfilled with clean fill. Soil and grou water remediation will be addressed in HTRW section of this estimate

Phase Element Type	Phase Element Name	Capital Cost	O&M Cost
Studies	PEA	85,335	
Remedial Design	RA-C	8,245	
Remedial Action	RA-C	126,851	
	Site Totals	220,430	0

Site

Name: Ordnance Storage & Machine Gun Range
ID: 02
Type: HTRW
Description: Evidence exists that the site included ordnance storage facility and a machine gu range. A project is recommended to locate any areas which may contain contar as a result of the use, storage or disposal of ordnance.

Phase Element Type	Phase Element Name	Capital Cost	O&M Cost
Studies	PEA	42,220	
Studies	RI/FS	803,898	
Studies	SI	121,820	
Remedial Action	RA-C	244,061	

Delete

Note: All costs are shown as "Present Value" costs (with markups, non-escalated)

Cost Database Date1/1/99

Print Date: 8/19/99 2:22:12 PM

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25 NOVEMBER 1997
Previous Editions Obsolete

APPENDIX B
RISK ASSESSMENT PROCEDURES FOR ORDNANCE AND EXPLOSIVE (OE) SITES

Site Name Outer Landing Field, Cotati
Site Location Sonoma, California
DERP Project # J09CA7470
Date Completed June 23, 1999

Rater's Name Betty Henkle
Phone No. 916-557-6826
Organization TechLaw, Inc.
RAC Score 4

OE RISK ASSESSMENT:

This risk assessment procedure was developed in accordance with MIL-STD 882C and AR 385-10. The RAC score will be used by CEHNC to prioritize the remedial action at Formerly Used Defense Sites. The UXO risk assessment should be based upon best available information resulting from records searches, reports of Explosive Ordnance Disposal (EOD) detachment actions, and field observations, interviews, and measurements. This information is used to assess the risk involved based upon the potential OE hazards identified at the site. The risk assessment is composed of two factors, **hazard severity and hazard probability**. Personnel involved in visits to potential OE sites should view the CEHNC videotape entitled "A Life Threatening Encounter:OE."

Part I. Hazard Severity. Hazard severity categories are defined to provide a qualitative measure of the worst credible mishap resulting from personnel exposure to various types and quantities of unexploded ordnance items.

TYPE OF ORDNANCE
(Circle all values that apply)

A. Conventional Ordnance and Ammunition:	VALUE
Medium/Large Caliber (20 mm and larger)	10
Bombs, Explosive	10
Grenades, Hand and Rifle, Explosive	10
Landmines, Explosive	10
Rockets, Guided Missiles, Explosive	10
Detonators, Blasting Caps, Fuzes, Boosters, Bursters	6
Bombs, Practice (w/spotting charges)	6
Grenades, Practice (w/spotting charges)	4
Landmines, Practice (w/spotting charges)	4
Small Arms, complete (.22 cal - .50 cal)	1
Small Arms, Expended	0

Practice ordnance (wo/spotting charges)	0
Conventional Ordnance and Ammunition (Select the largest single value)	1

What evidence do you have regarding conventional UXO?

B. Pyrotechnics (For munitions not described above.)

	VALUE
Munition (Container) Containing White Phosphorus or other Pyrophoric Material (i.e., Spontaneously Flammable)	10
Munition Containing A Flame or Incendiary Material (i.e., Napalm, Triethlaluminum Metal Incendiaries)	6
Flares,Signals, Simulators	4
Pyrotechnics (Select the largest single value)	0

What evidence do you have regarding pyrotechnics? None

C. Bulk High Explosives (Not an integral part of conventional ordnance; uncontainerized.)

	VALUE
Primary or Initiating Explosives (Lead Styphnate, Lead Azide, Nitroglycerin, Mercury Azide, Mercury Fulminate, Tetracene, etc.)	10
Demolition Charges	10
Secondary Explosives (PETN, Compositions A, B, C, Tetryl, TNT, RDX, HMX, HBX, Black Powder, etc.)	8
Military Dynamite	6
Less Sensitive Explosives (Ammonium Nitrate, Explosive D, etc.)	3
High Explosives (Select the largest single value)	0

What evidence do you have regarding bulk explosives? None

D. Bulk Propellants (Not an integral part of rockets, guided missiles, or other conventional ordnance; uncontaine[redacted]ed)

	VALUE
Solid or Liquid Propellants	6
Propellants	0

What evidence do you have regarding bulk propellants? None

E. Chemical Warfare Material and Radiological Weapons

	VALUE
Toxic Chemical Agents (Choking, Nerve, Blood, Blister)	25
War Gas Identification Sets	20
Radiological	15
Riot Control Agents (Vomiting, Tear)	5
Chemical and Radiological (Select the largest single value)	0

What evidence do you have of chemical/radiological OE? None

TOTAL HAZARD SEVERITY VALUE 1
(Sum of Largest Values for A through E–Maximum of 61)
Apply this value to Table 1 to determine Hazard Severity Category.

TABLE 1

HAZARD SEVERITY*

Description	Category	Hazard Severity Value
CATASTROPHIC	I	21 and greater
CRITICAL	II	10 to 20
MARGINAL	III	5 to 9
NEGLIGIBLE	IV	1 to 4
**NONE		0

* Apply Hazard Severity Category to Table 3.

**If Hazard Severity Value is 0, you do not need to complete Part II. Proceed to Part III and use a RAC Score of 5 to determine your appropriate action.

Part II. Hazard Probability. The probability that a hazard has been or will be created due to the presence and other rated factors of unexploded ordnance or explosive materials on a formerly used DOD site.

AREA, EXTENT, ACCESSIBILITY OF OE HAZARD
(Circle all values that apply)

A. Locations of OE Hazards

	VALUE
On the surface	5
Within Tanks, Pipes, Vessels or Other confined locations.	4
Inside walls, ceilings, or other parts of Buildings or Structures.	3
Subsurface	2
Location (Select the single largest value)	2

What evidence do you have regarding location of OE? The area where the machine gun range and the small arms magazine was located now consists of apartment buildings, retail stores, and restaurants.

B. Distance to nearest inhabited locations or structures likely to be at risk from OE hazard (roads, parks, playgrounds, and buildings).

	VALUE
Less than 1250 feet	5
1250 feet to 0.5 miles	4
0.5 miles to 1.0 mile	3
1.0 mile to 2.0 miles	2
Over 2 miles	1
Distance (Select the single largest value)	5

What are the nearest inhabited structures/buildings? The area where the machine gun range and the small arms magazine was located now consists of apartment buildings, retail stores, and restaurants.

C. Number of buildings within a 2 mile radius measured from the OE hazard area, not the installation boundary.

	VALUE
26 and over	5
16 to 25	4
11 to 15	3
6 to 10	2
1 to 5	1
0	0
Number of Buildings (Select the single largest value)	3

Narrative The area consists of apartment buildings, office buildings, retail stores, and a trailer park.

D. Types of Buildings (within a 2 mile radius)

	VALUE
Educational, Child Care, Residential, Hospitals, Hotels, Commercial, Shopping Centers	5
Industrial, Warehouse, etc.	4
Agricultural, Forestry, etc.	3
Detention, Correctional	2
No Buildings	0

Types of Buildings (Select the largest single value) 5

Describe types of buildings in the area. The area consists of a theater, retail stores, restaurants, and a bank.

E. Accessibility to site refers to access by humans to ordnance and explosive wastes. Use the following guidance:

BARRIER	VALUE
No barrier or security system	5
Barrier is incomplete (e.g., in disrepair or does not completely surround the site). Barrier is intended to deny egress from the site, as for a barbed wire fence for grazing.	4
A barrier, (any kind of fence in good repair) but no separate means to control entry. Barrier is intended to deny access to the site.	3
Security guard, but no barrier	2
Isolated site	1
A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) which continuously monitors and controls entry onto the facility; or	0

An artificial or natural barrier (e.g., a fence combined with a cliff), which completely surrounds the facility; and a means to control entry, at all times, through the gates or other entrances to the facility (e.g., an attendant, television monitors, locked entrances, or controlled roadway access to the facility)

Accessibility (Select the single largest value) 5

Describe the site accessibility. The site is accessible by walking or by vehicle. There are no barriers preventing access.

F. Site Dynamics - This deals with site conditions that are subject to change in the future, but may be stable at the present. Examples would be excessive soil erosion by beaches or streams, increasing land development that could reduce distances from the site to inhabited areas or otherwise increase accessability.

	VALUE
Expected	5
None Anticipated	0
Site Dynamics (Select largest value)	0

Describe the site dynamics.

TOTAL HAZARD PROBABILITY VALUE
(Sum of Largest Values for A through F--Maximum of 30) 20
Apply this value to Hazard Probability Table 2 to determine Hazard Probability Level.

TABLE 2

HAZARD PROBABILITY

Description	Level	Hazard Probability Value
FREQUENT	A	27 or greater

PROBABLE	B	21 to 26
OCCASIONAL	C	15 to 20
REMOTE	D	8 to 14
IMPROBABLE	E	less than 8

* Apply Hazard Probability Level to Table 3.

Part III. Risk Assessment. The risk assessment value for this site is determined using the following Table 3. Enter with the results of the hazard probability and hazard severity values.

TABLE 3

Probability Level	FREQUENT A	PROBABLE B	OCCASIONAL C	REMOTE D	IMPROBABLE E
Severity Category:					
CATASTROPHIC I	1	1	2	3	4
CRITICAL II	1	2	3	4	5
MARGINAL III	2	3	4	4	5
NEGLIGIBLE IV	3	4	4	5	5

RISK ASSESSMENT CODE (RAC)

RAC 1 Expedite INPR, recommending further action by CEHNC - Call CEHNC-OE-S (commercial 256-895-1582/1598)

RAC 2 High priority on completion of INPR - Recommend further action by CEHNC

RAC 3 Complete INPR - Recommend further action by CEHNC.

RAC 4 Complete INPR - Recommend further action by CEHNC.

RAC 5 Usually indicates that no further action (NCFA) is necessary. Submit NCFA and RAC to CEHNC.

Part IV. Narrative. Summarize the documented evidence that supports this risk assessment. If no documented evidence was available, explain all the assumptions that you made.

Research indicates that the property contained a small arms magazine and a machine gun range. These buildings are no longer at the site. The property is now fully developed, consisting of a theater, retail stores, bank, restaurants, a trailer park, apartment buildings, and office buildings. There have been no incidents regarding OE at the site.

ENVIRONMENTAL
GEOLOGY
SERVICES
CONSULTING and PROJECT MANAGEMENT
1695 Willowside Road, Santa Rosa, CA 95401

March 3, 2004

Mr. Marvin Pederson
Attorney at Law
1815 5th Street, Suite 200
Santa Rosa, CA 95401

RE: PRELIMINARY REVIEW
POTENTIAL HAZARDOUS MATERIALS IMPACTS
FORMER U. S. NAVY COTATI OUTER LANDING FIELD
AND DOWN GRADIENT AREAS
RHONERT PARK, CALIFORNIA

To Whom It May Concern:

This review and letter has been prepared in accordance the request of Mr. Chip Worthington.

PURPOSE AND BACKGROUND

The purpose was to conduct a preliminary review of some of the readily available information regarding the site history of the former U. S. Navy Cotati Outer Landing Field (Cotati OLF). The focus of this preliminary review is on potential hazardous materials impacts at and adjacent to the Cotati OLF from past military activities, specifically with regard to the proposed casino development west of the Cotati OLF. State and local regulatory agencies should be aware of potential hazardous materials impacts to the area.

Previous military use of the site is of potential concern because of possible future development of parts of the Cotati OLF and down gradient areas. Past site use may have resulted in hazardous materials impacts that may adversely impact area residents during construction, and might have possible negative impacts to future occupants of developed projects. Additionally there is concern that potential environmental conditions could adversely impact workers during construction activities. Military activities at the Coati OLF may have potentially impacted adjacent and down gradient areas such as the proposed casino site and these potential impacts should be more clearly defined and remediated prior to development.

SCOPE OF WORK

For this preliminary review the scope of work was limited to the following:

1. Review background summary history prepared by Marilee Montgomery,

2. Review available stereo pair air photos of the site and area (June 12, 1956, AV222-03, frames 8 & 9, scale 1:24,000, and later years),

3. Review U. S. Army Corps of Engineers Memorandum to Vincent Del Greco from Mark C. Charlton, dated September 10, 1999

4. Review report on Cotati OLF by TechLaw, Inc. prepared for the U. S. Army Corps of Engineers, Sacramento District, dated September 1999.

SUMMARY OF FINDINGS

Based on the results of the above review it is our opinion that the Cotati OLF has the following characteristics:

- The Cotati OLF consisted of two parcels of land: a 218.25 acre parcel and a 74.85 acre parcel. The 218.25 acre parcel was apparently the main airfield, but the location of the 74.85 acre parcel has not yet been determined.

- The Cotati OLF was operated by the U. S. Navy from approximately 1944 through 1949 and the facility included two runways, a crash and fire truck building, barracks, a control tower, oil and gasoline storage, small arms magazine and a machine gun range.

- Fuel testing was conducted at the facility by Standard Oil of California from 1957 to 1958 after it was declared excess government property. Also in the 1950's and later it was used as for drag racing and sports car racing.

- In 1983 the U. S. Army began identify inactive military facilities to be evaluated for possible toxic waste and hazardous materials issues. Aproximatly 90% of these facilities known as Formerly Used Defense Sites (FUDS), have been evaluated for clean up eligibility. Issues of concern at FUDS depend on past site activities and include: fuels and solvents in ground water, buried explosives and ordnance, asbestos, dump sites and lead contamination. The Cotati OLF was identified as a FUDS by 1996 and in 1999 the former Navy base was determined eligible for the FUDS mitigation program.

- LawTech was retained by the U. S. Army Corps of Engineers to assess the property (referred to as the 216.95 acre parcel). Their report makes reference to an oil storage building, gasoline storage, a small arms magazine and a machine gun range located on the facility, and underground storage tanks. The report indicated two categories of remedial / clean up projects: OE - Evidence of ordinance storage. Recommends finding the locations of waste sites that may contain unexploded ordnance, and CON/HTRW - Evidence of underground gasoline storage tanks. Recommends locating tanks and testing soil for possible contamination. For some reason they did not discuss lead contamination impacts from the machine gun firing range.

- Analysis of stereo pair air photos of the Cotati OLF taken in 1956, some seven years after Navy operations show the runways, access roads, probable aircraft machine gun test range berm (near west end of runway), and remaining buildings / building pads. The property from the west end of the runways to Stony Point Road are pockmarked with numerous circular, crater like features, and this area contains a larger area of disturbed soil. Although the origin of these features is not known, they could be related to previous military activities such as waste disposal or ordinance disposal. These areas are down gradient from the runways and appear to be outside of the 218.25 acre parcel comprising the main Cotati OLF. This area might contain the previously referenced 74.85 acre parcel.

CONCLUSIONS

The U. S. Army Corps of Engineers records show the Cotati OLF site as a declared potential hazardous waste site which has been recommended for further exploration and possible remediation. The presence of the Cotati OLF has the potential to impact adjacent and especially down gradient property such as the area of the proposed casino development.

Although the amount of aircraft maintenance was performed at the site is not known, if chlorinated solvents were used (a common WW-II era practice in aircraft parts cleaning) both shallow and deep ground water resources could be impacted. These kinds of liquid hazardous wastes were typically disposed of in on site "dry wells".

To date no known effort has been made to locate the underground storage tanks (USTs) and determine their impacts to the local ground water. Underground fuel tanks from this era have a high potential to have leaked and caused contamination to the shallow ground water with compounds that include benzene, toluene, xylenes and ethylbenzne.

As with the USTs, no known effort has been made to locate possible buried unexploded ordinance, even though this has been recommended by the U. S. Army Corps of Engineers contractors.

The location of the machine gun range has not been verified or explored with regard to lead contamination. However our preliminary air photo review suggests there was a berm off the western end of the runways that may have been used for testing aircraft machine guns.

Because of the known and suspected hazardous materials characteristics of the Cotati OLF and its proximity to the proposed development to the west (including the proposed casino project) the U. S. Army Corps of Engineers in cooperation with the Sonoma County Environmental Health Division, the California Department of Toxic Substances Control, and the North Coast - Regional Water Quality Control Board should make it a priority to:

- Locate the USTs and explore the vertical and lateral extent of possible ground water contamination, especially with regard to benzene a significant constituent of gasoline and a known carcinogen. If present, this contaminant has the potential to impact existing and future water wells in the area and down gradient form the former USTs.

- Analyze soil and water samples for chlorinated solvents during the soil and ground water exploration for the USTs. This would be prudent since if present, chlorinated solvents could impact deeper ground water zones and impact the regional ground water resource. In addition further historical research, in conjunction with a soil gas screening survey should be done to determine locations of aircraft maintenance activities and identify related solvent waste disposal sites.

- Conduct the necessary research to locate/ verify the former machine gun range and undertake a through soil exploration and testing program. If this site is in the area of proposed future development there could be significant human health risks to construction workers and down wind residents due to lead dust exposure. Once the machine gun range is identified the area should be properly explored and sampled, and remediated before any development to mitigate this potential health risk. Based on the available information on the period of use of the range and the resulting amount of lead (as well as phosphorous from tracer rounds), remedial costs could be in the millions to 10's of millions of dollars, depending on the volume of soil and the area of dispersal.

- Conduct the necessary research to locate potential buried ordinance and remove and safely dispose of these materials if found. If these potential disposal sites are located in proposed development areas, they could pose a high risk to construction workers and subsequent facility occupants.

- The U. S. Army Corps of Engineers in conjunction with County and State agencies should make it a priority to conduct the necessary research to identify the locations of the reported and suspected hazardous materials impacts to the Cotati OLF, explore and define the extent of off site impacts to soil and ground water (deep and shallow) and conduct the necessary remediation. As development is encroaching on the undeveloped property in the area it would be prudent to locate and remediate any hazardous materials related to the former military activities as soon as possible. The time to conduct the needed research, investigation and possible remedaition could take a few to several years.

LIMITATIONS

This work has been performed in accordance with generally accepted environmental review practices for similar preliminary reviews conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

The scope of work performed to complete this preliminary information review was limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or wastes, we also must alert the reader that this review may not reveal hazardous materials releases that have occurred. Also, site conditions can change with time, and our assessment was not intended to predict future site and off site conditions. Because of the limited nature of this review, site history was developed based only on information provided and a review of limited government documents. This report is not a risk assessment and the Scope of Work provided does not include a determination of the extent of, nor the environmental or public health impact of, known or suspected hazardous materials or wastes.

It is understood by the parties hereto that the Client who has requested this review will use the report (in addition to other information) to provide information to local and state public agencies to assist those regulatory agencies in making decisions about development of property at and near the Cotati OLF. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of properties that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety.

CLOSURE

I trust the foregoing preliminary evaluation and opinions are sufficient for the State and County regulatory agencies to determine if they should, in the public interest, follow up on these environmental concerns. If you or the regulatory agencies involved have any questions, please give me a call.

Sincerely,
ENVIRONMENTAL GEOLOGY SERVICES

Marc W. Seeley, RG, REA-II
Principal Geologist

703

Chad Broussard

From: "Nielson, Scott" <Scott.Nielson@StationCasinos.com>
To: "'Chad Broussard'" <cbroussard@analyticalcorp.com>
Sent: Tuesday, March 16, 2004 2:27 PM
Subject: FW: Casino

From: gloriawohl@netzero.com [mailto:gloriawohl@netzero.com]
Sent: Tuesday, March 16, 2004 12:27 PM
To: coastmiwok@aol.com
Cc: gloriawohl@netzero.com
Subject: Casino

GLORIA WOHLSCHLAEGER

SPRING STREET 809

SAUSALITO, CA 94965

4153324494 Email -

gloriawohl@netzero.com

March 16, 2004

Re: Casino at Stony Point Road and Rohnert Park Expressway

I grew up in this neighborhood and my son is now bringing up his family in the same home in this neighborhood.

We went to the County of Sonoma and the City of Rohnert Park in the year of 2000 when we were making a decision about our property to inquire about zoning. We were told emphatically that this area is all zoned as greenbelt in the general plan and is meant to be a separation between the development of Santa Rosa and Rohnert Park.

There are a few issues which frighten me.

One is the depletion of groundwater. There are several homes in the area, many of which have been inhabited by the same people for a long time. They are all served by their own wells and I don't know what they would do if a well was to be drilled to serve the casino and hotel's needs.

The exact area where this development would occur floods during heavy rains. We observed that just recently in this past winter.

The traffic on the narrow rural roads serves the country homes, but probably would not be safe with a large number of vehicles added on a daily basis.

Yours truly,
Gloria Wohlschlaeger

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4/5/04

April 1, 2004

SON-101-15.02
SON101877

Ms. Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th floor
Washington, DC 20005

Dear Ms. Nagle:

Graton Rancheria Casino Project – Draft Environmental Impact Statement (DEIS) Scoping Comments

Thank you for including the California Department of Transportation (Department) in the environmental review process for the proposed casino project. We have reviewed the Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement (DEIS) and have the following comments to offer:

Traffic Impact Analysis Scope

We recommend a traffic impact analysis be completed to determine potential impacts of the proposed project on State transportation facilities. Impacts to the following specific facilities should be included in the analysis:

- Mainline U.S. 101
- Mainline State Route (SR) 116
- Mainline SR 12
- U.S. 101 ramps and ramp intersections at Wilfred Avenue
- U.S. 101 ramps and ramp intersections at Rohnert Park Expressway
- U.S. 101 ramps and ramp intersections at Todd Road
- Proposed U.S. 101 ramps and ramp intersections at Bellevue Avenue
- SR 116/ Stony Point Road Intersection
- SR 12/ Stony Point Road Intersection
- SR 116/ U.S. 101 Interchange
- Any other State highways (such as SR 121 and SR 37) that may be impacted by the proposed project

The procedures contained in the 2000 update to the Highway Capacity Manual should be used as a guide for completing the traffic impact analysis. We also recommend using the

Department's *"Guide for the Preparation of Traffic Impact Studies"* for additional guidance in preparing the analysis. The scope of the traffic impact analysis should include, but not be limited to the following information:

- A mainline analysis of U.S. 101 to ensure that the U.S. 101/ Wilfred Avenue and U.S. 101/ Rohnert Park Expressway on-ramps do not experience vehicle queuing. Freeway conditions can impact the number of vehicles that can enter the freeway from an on-ramp. If the on-ramp demand exceeds the number of vehicles that can actually get on a freeway, vehicle queuing will occur on the on-ramp.

- Ramp intersection analyses to determine if existing vehicle storage would be adequate to accommodate project and cumulative traffic.

- Information on the proposed project's traffic impacts in terms of trip generation, distribution, and assignment. Include an illustration that clearly shows the percentage of project trips assigned to State highways, intersections, and ramps. The assumptions and methods used to estimate the number of trips generated should be carefully considered and fully explained in the analysis so that others may determine if they are realistic.

- Current Average Daily Traffic (ADT) and AM and PM peak hour volumes during weekdays and weekends on all significantly affected streets, highway segments, intersections, and ramps.

- Schematic illustration of the traffic conditions for: 1) existing, 2) proposed project only, 3) existing plus proposed project, and 3) cumulative for affected highway segments, intersections, and ramps.

- Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect the State highway facilities being evaluated. The City of Rohnert Park has received a preliminary application for development of a regional commercial land use on the Stadium Lands, which is currently an industrial land use. This project should be included in the cumulative analysis, along with all of the City's specific plan proposals. Please contact the City Planning Department for more specific information on these projects and plans.

- The most recent Sonoma County Traffic Model should be used to determine the distribution and assignment of the trips generated by the proposed project. The model output should be used to determine the cumulative impact from the proposed project and other planned developments in the area. The model should be validated against traffic counts for the base year in the area that will be subject to operational analysis to confirm that it is returning reasonable results. If needed, it should be refined so that its base year forecasts conform to criteria such as those in the Federal Highway Administration's *"Model Validation and Reasonableness Checking Manual"*, which can be reviewed at http://tmip.fhwa.dot.gov/clearinghouse/docs/mvrcm/.

- An assessment of whether or not this project, when built out, will increase traffic and tourism to Sonoma County's coast. Potential impacts on State and County roads that provide access to the coast should be studied. Depending upon the amount of traffic generated by the proposed project that will travel towards the coast, the Tribe may want to consider running shuttle vans to major beaches and towns along the coast and the Russian River resort area.

- A discussion of planned transportation projects in the area. This includes the widening of U.S. 101 between Rohnert Park Expressway and Wilfred Avenue to add a high-occupancy-vehicle (HOV) lane in each direction. As part of this project the Wilfred Avenue interchange will be modified. The final environmental document for this project will be released in December 2004, but funding for construction of the project has been delayed from 2006/2007 to 2008/2009. The widening of U.S. 101 between Steele Lane and SR 12 is a fully funded project and is tentatively scheduled to begin construction in March 2005. The Steele Lane interchange will be modified as part of this project.

Mitigation

The DEIS should identify mitigation measures for all significant impacts due to the proposed project. These mitigation measures should be fully discussed, including financing, scheduling, implementation responsibilities, and lead agency monitoring. We suggest using Appendix B in the Department's *Guide for the Preparation of Traffic Impact Studies* to calculate the project's fair share fees for transportation mitigation. The Guide can be accessed from the following web site: http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

The Department considers the following to be significant impacts that would require mitigation:

- Off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway,
- Vehicle queues at intersections that exceed existing lane storage,
- Traffic impacts that cause any ramp's merge/diverge level of service (LOS) to be worse than the freeway's LOS, and
- Traffic impacts that cause the LOS to deteriorate below LOS E for freeways and LOS D for highways and intersections. If the LOS is already "E" or "F", then a quantitative measure of increased queue lengths and delay should be used to determine appropriate mitigation measures.

Federal Legislative Obligations

Federal legislation recognizing the Rancheria mandates that the Bureau of Indian Affairs (BIA) provide land to the tribe to be placed into trust in either Marin, Sonoma, or Napa counties. It is apparent that a casino and hotel will be a major, primary source of income for the tribe. Please clarify whether the land in the current proposal will be used for other tribal purposes, such as tribal headquarters/administrative functions, tribal housing, health care facilities, and a meeting hall for tribal council meetings, or whether these activities will be located elsewhere. The DEIS should include a statement of whether this project site will comply with and complete BIA's legislative obligations to the tribe.

Received 04-01-04 05:31pm From-6102866613 To-2026327066 Page 003

Transit Alternatives

We recommend the Tribe and project sponsor coordinate with the Sonoma-Marin Area Rail Transit (SMART) District to financially support the proposed rail service along the U.S. 101 corridor. The District's contact and project information is on the following web site: http://www.sonomamarintrain.org.

In addition, the DEIS should evaluate the following transit alternatives as a way to mitigate air pollution and single-occupant vehicle traffic that will be generated by the proposed project. :

- Consider the operation of a free shuttle from the proposed Rohnert Park SMART station to and from the project site.
- Direct express bus service to and from the Golden Gate Transit ferry terminal at Larkspur.
- Local bus service as an integral component to bring visitors, as well as employees (who will be working night-shifts due to the casino being open 24 hours a day), to and from the proposed project site.
- That buses serving the project be electric or other clean fuel models.
- Consider operating a shuttle service between the Dry Creek Rancheria casino and the proposed Graton casino in order to reduce single occupant auto travel between the two casinos.

Please send three copies of the DEIS, traffic impact study, and all technical appendices and level-of-service calculation sheets to the following address:

Maija Cottle
Office of Transit and Community Planning
Department of Transportation, District 4
P.O. Box 23660
Oakland, CA 94623-0660

We look forward to working with the Federated Indians of Graton Rancheria, BIA, and NIGC in implementing mitigation to reduce or eliminate any significant project impacts on State transportation facilities.

Should you require further information or have any questions regarding this letter, please call Maija Cottle of my staff at (510) 286-5737.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

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TELEPHONE (707) 565-2431
FAX (707) 565-3778

MIKE CHRYSTAL
COUNTY ADMINISTRATOR
BOB DEIS
ASST. COUNTY ADMINISTRATOR
RON PIOREK
DEP. COUNTY ADMINISTRATOR
GAYLE GOLDBERG
DEP. COUNTY ADMINISTRATOR

March 30, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, D.C. 20005

Dear Ms. Nagle:

Enclosed please find Sonoma County's comments on the "Notice of Intent to Prepare an Environmental Impact Statement and of a Scoping Meeting for the Federated Indians of Graton Rancheria Casino and Hotel Project, Sonoma County" published by the National Indian Gaming Commission in the Federal Register on February 12, 2004. These comments will be considered for approval by the Board of Supervisors at their meeting on April 6, 2004.

We appreciate the opportunity provided to County staff to meet with you, Lorelle Ross (Federated Indians of Graton Rancheria), Bill Allan (Bureau of Indian Affairs, Pacific Regional Office) and Chad Broussard (Analytical Environmental Services) on March 11th to discuss the scoping process, as well as the County's role in the environmental review. Further, we appreciate your willingness to extend the deadline for the County's comments to April 12th to allow time for the Board's consideration. I will contact you again after the Board meeting to inform you of any changes requested to the comments, or simply to let you know that the attached comments were approved as written.

Should you have any questions, please do not hesitate to contact me at (707) 565-2431.

Cordially,

Gayle Goldberg

Gayle Goldberg
Deputy County Administrator

Attachments

2004 APR -1 AM 9:41
NATIONAL INDIAN GAMING COMMISSION

SCOPE OF ENVIRONMENTAL REVIEW FOR GRATON RANCHERIA CASINO AND HOTEL PROJECT

The environmental issues presented below are Sonoma County's (County) response to the "Notice of Intent to Prepare an Environmental Impact Statement and of a Scoping Meeting for the Federated Indians of Graton Rancheria Casino and Hotel Project, Sonoma County" published by the National Indian Gaming Commission in the Federal Register on February 12, 2004.

Unfortunately, the County's ability to comment meaningfully on the scope of the Environmental Impact Statement (EIS) has been limited by the lack of a full project description. In order to fully assess potential impacts, the EIS must include a complete and detailed description of the project including, at minimum, the following components:

- A detailed site plan showing all proposed structures and improvements. This must include all building, parking and circulation areas, ingress and egress to the site, utility facilities (e.g., water, wastewater and storm drainage) and any ancillary uses that are proposed for the site.
- Proposed architectural designs for all proposed structures, including building elevations.
- All proposed signage for the project, on- and off-site.
- A lighting plan for the site.
- Preliminary engineered grading and drainage plans.
- Any off-site improvements that are proposed, including off-site parking and transportation facilities.
- Operational details of the proposed facility, including number of visitors expected, hours of operation for the various components, anticipated use of the event facility, availability of alcoholic beverages (including hours that alcohol will be served), whether 18 year olds will be allowed to gamble, etc.

In addition, the EIS should evaluate any identified mitigation measures to determine whether the mitigations have secondary impacts, whether they are economically feasible and the timing of such mitigations relative to project implementation. The County is particularly concerned that the EIS may identify significant off-site traffic mitigation measures that will result in impacts of their own and will require significant coordination with, and potentially funding from, non-tribal entities before implementation. These issues must be explored fully in the EIS.

Sonoma County is requesting that the issues below be addressed in the EIS for the Federated Indians of Graton Rancheria's proposed casino and hotel resort. For each issue evaluated, we ask that the current baseline data be provided, along with the anticipated impacts, mitigations and secondary impacts.

TRAFFIC, TRANSPORTATION AND PARKING

1. The EIS must include a complete evaluation of the increased traffic that will result from the project and the impact of that traffic on the surrounding road system. The analysis must consider both the direct impacts of the project and the cumulative impacts of the project together with other growth and development in the area. Consider the year 2020 for cumulative impacts (both with and without the project), and include the projected growth. The analysis should consider the impacts on roads, intersections, interchanges and state highways during both the weekday and weekend peak hours. Specific issues for the traffic impact analysis are detailed below.

2. Evaluate impacts on the Highway 101 corridor, including the exits and entrances to Highway 101 and other likely routes to and from the project site from throughout the region.

3. Consider the potential change to the level of service of all area roads and intersections, including the following:
   - Wilfred Avenue
   - Wilfred Avenue Interchange
   - Rohnert Park Expressway
   - Rohnert Park Expressway Interchange
   - Stony Point Road
   - Highway 116
   - Highway 116 Interchange
   - Adobe Road
   - Petaluma Hill Road
   - Old Redwood Highway
   - Highway 121
   - Highway 37
   - Lakeville Road/Lakeville Highway
   - Golf Course Drive
   - Todd Road Interchange

   A number of these roads and interchanges are already utilized as reliever routes due to existing congestion on Highway 101 and may be further impacted by development of the casino and hotel resort.

4. Evaluate the impacts of special event traffic, including weekend and evening peak hours, for the casino and hotel complex. Include an analysis of cumulative impacts from other such special event venues such as the Spreckels Performing Arts Center, Sonoma State University and the future Green Music Center.

5. For any traffic evaluations, we request that the consultant use (1) the County's Guidelines for Traffic Reports and CalTrans traffic manuals, including standards and thresholds of significance criteria when determining impacts in the unincorporated area or along state highways (Attachment 1); and (2) the recently updated countywide traffic model used for the General Plan 2020 to project future cumulative traffic with and without the casino and hotel project. (Contact Greg Carr, Permit and Resource Management Department, 565-1944)

6. Evaluate bicycle and pedestrian safety and access in and around the property.

7. Evaluate what transit and paratransit service is currently available. How will transit and paratransit systems be affected by the proposed project, and how could such services be increased?

8. Evaluate any potential traffic hazards that could be created by the project, such as a dangerous driveway intersection or exacerbating an existing hazardous condition. Typically, the most recent three years of California Highway Patrol traffic accident data should be reviewed to determine whether the principal access routes to the project have high accident locations or road segments with high accident rates.

9. Describe the parking needs of the project and how these needs will be met on-site.

10. Does the project propose to use any of the existing Park and Ride lots? If so, evaluate the impacts to the capacity of these lots. Does the project anticipate shuttle service, and if so, from where?

11. In discussing mitigations to traffic congestion, evaluate the viability of a rail station within the area and the impacts of such a station, both in terms of congestion relief and on the community and surrounding roads.

GROUND AND SURFACE WATER ISSUES/WATER AND SEWAGE ISSUES

Water Supply and Groundwater

1. Calculate the project's demand for groundwater, including the annual, daily, and peak month water demand. What is the water balance for the project? Will groundwater be used for irrigation?

2. Discuss the source(s) of water supply for the project. Which water quality standards will apply to the project's water supply, and how will the project ensure compliance?

3. From what depth will groundwater be pumped? How will groundwater levels be monitored over time?

4. Describe the effects of the project on nearby wells. The analysis should determine whether groundwater pumping associated with the project would adversely affect nearby groundwater users (e.g., whether the production rate of nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted). Accordingly, an assessment of the effects of the project's groundwater pumping should be conducted and should consider both short-term hydrogeologic conditions (e.g., an annual seasonal cycle) and longer time periods that account for hydrogeologic conditions representing various weather conditions (e.g., normal year, critical dry year, and multiple dry years).

5. Will the project result in any degradation of water quality? Will groundwater pumping negatively affect water quality by inducing the spread of contamination from existing groundwater plumes?

6. Determine the cumulative impact on groundwater and whether there is an adequate supply for the project that will not cause or contribute to a net deficit in aquifer volume or long term lowering of the groundwater table. The cumulative impact analysis must consider other existing water supply wells in the Santa Rosa plain groundwater basin, such as those of the Cities of Rohnert Park, Cotati and Sebastopol; the County; the Sonoma County Water Agency; private water companies; and private landowners. Consider the potential for groundwater use by public water suppliers within the Santa Rosa groundwater basin to meet planned growth.

7. Evaluate the impact of the project on groundwater recharge.

8. Will the project voluntarily follow best management practices (BMPs) for water conservation? (See the California Urban Water Conservation Council website: http://www.cuwcc.org/home.html. The BMPs for water conservation are located in the "Memorandum" section of their homepage.)

<u>Sanitation/Wastewater</u>

1. The EIS must include a detailed description and full evaluation of the proposed waste disposal system.

2. If a package treatment plant is proposed, evaluate how the proposed project meets the attached standards for such treatment plants (Attachment 2).

3. Calculate the quantity of wastewater needing treatment, and prepare a water balance.

4 Evaluate the risk of contaminating local groundwater or surface water.

5. Will there be a discharge to surface waters? If so, where will the discharge occur? How will the project ensure that it meets the standards under the California Toxics Rule? Will the project be subject to an operational permit? If so, will the permit be administered by the EPA or the North Coast Regional Water Quality Control Board? Will California Toxics Rule criteria be included in an operational permit?

6. Which water quality standards will the project comply with? Will the project comply with the requirements established by the North Coast Regional Water Quality Control Board for other development within the area? If not, in what ways will the wastewater treatment requirements of the project differ from those of the North Coast Regional Water Quality Control Board?

7. What level of treatment will be provided (secondary required by EPA, tertiary required by Basin Plan)?

8. Will the seasonal discharge prohibition per the Basin Plan (no discharge during summer) be applied if there is a discharge? If so, is there adequate on-site area for summer irrigation?

9. If the plant is zero discharge, describe and evaluate the adequacy of on-site storage and/or reuse areas.

10. Which agency will oversee recycled water use offsite and/or on-site?

11. If subsurface disposal is used, evaluate the adequacy of the soils for in-ground treatment and the availability of sufficient irrigation lands. The EIS should provide data regarding the percolation rate. Is the percolation rate adequate? Is separation to groundwater adequate?

12. What type of disinfectant will be used? If chlorine is used, how will public safety and environmental issues be addressed? Will there be a risk management plan that addresses the potential for spills?

13. Has the project investigated connecting to the subregional system? What additional wastewater facilities would be needed, and how would such a connection affect the subregional system's existing commitments?

14. How will the treatment, storage, and disposal facilities operate during flood conditions?

Flood Control/Stormwater Runoff

1. Describe how the project will alter the volume of runoff and the existing drainage pattern of the site or area, including through the alteration of any drainage course. Describe any potential erosion or siltation impacts on- or off-site. Provide a preliminary drainage and grading plan.

2. Describe how the project will affect the capacity of existing or planned flood control and stormwater drainage systems. Describe whether the project could result in substantial additional sources of polluted runoff.

3. Will the project place development within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? If so, please describe and evaluate the impact. Will the project place structures that would impede or redirect flood flows within a 100-year flood hazard area? If so, please describe and evaluate the impact.

4. Will the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? If so, please describe and evaluate the impact.

5. Determine the effect on the Laguna de Santa Rosa floodplain, including how increased runoff from the site will affect flooding on-site, in the immediate area, or downstream in the Laguna. Be certain to include the effect on surrounding neighbors (e.g. mobile home park and Wilfred Avenue).

6. Identify the amount of cut and fill, and evaluate the impact to the floodplain functions and its effects on drainage.

7. Evaluate the consistency of the project with the County's floodplain policies (Attachment 3).

8. Will the project utilize Hinebaugh Creek and/or the Bellevue Wilfred Channel, for which the Sonoma County Water Agency is responsible? If so, please describe and evaluate the impacts on these channels/streams and any waterway downstream. Will the project include any structures that cross Hinebaugh Creek and/or the Bellevue Wilfred Channel? If so, please describe.

9. Will the project seek a National Pollutants Discharge Elimination System (NPDES) permit from the North Coast Regional Water Quality Control Board or from the EPA?

10. If the project will increase runoff from the site, will the project voluntarily comply with the Sonoma County Water Agency's flood control design criteria (Attachment 4)?

FIRE AND EMERGENCY SERVICES/PUBLIC SERVICES

1. Evaluate the need for additional public services, including fire, police, or other emergency services, schools, human and social services, solid waste services, utilities and criminal justice services resulting from the project and the capability of existing service providers to accommodate the additional demand.

2. Will the public areas of the casino and hotel resort complex allow smoking? If so, what mitigations will be provided to reduce exposure to second-hand smoke?

3. What entity will be responsible for providing law enforcement response to the project? What is the current capacity of that provider? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

4. What entity will be responsible for providing fire response to the project? What is the current capacity of that provider? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

5. What entity will be responsible for providing ambulance response to the project? What is the current capacity of that provider? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

6. What entity or entities will be responsible for providing other emergency services to the project, including hazardous materials spills or disasters other than fires (flooding, earthquakes, and major vehicular accident blocking ingress/egress to facility)? What is the current capacity of those providers? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

7. What type of mutual aid response may be required for various emergency response issues (including law enforcement, fire, ambulance, and other emergency response scenarios), and what entities would be impacted? What is the current capacity of those emergency response providers? Evaluate the service needs of the casino and hotel complex and how those service needs will impact services to other residents and businesses in the affected area.

8. What fire standards will the project comply with? Will the Tribe agree to comply with the Sonoma County Fire Code (Attachment 5)?

9. What type of built-in fire protection will be installed in the project?

10. What entity will provide fire plan review and inspection services for construction of the project?

11. What entity will provide maintenance fire code inspection and enforcement during operation of the project?

12. Will the project complete and provide a copy of an emergency evacuation plan prior to beginning operations?

13. What training and certification will be required of staff on-site who will be responsible for responding to emergency situations?

14. Which building codes will the project comply with? Will the Tribe agree to comply with Sonoma County's Building Ordinance, Chapter 7 of the Sonoma County Code (Attachment 6)?

15. Identify and address potential impacts of hazardous materials that may be used in construction and operation of the project, as well as methods of hazardous materials transport, storage and disposal.

16. How will the project comply with federal, state and local hazardous materials regulations? Which entity will be responsible for regulation enforcement?

17. Summarize the results of the Phase I Environmental Assessment that has been completed for the site and include a copy of that assessment as an appendix. Further, please address the public assertion that the site may be contaminated with hazardous materials related to historic military uses on the site or in the immediate area.

18. Evaluate and describe the need for additional criminal justice services, including the increased demand for public defender or indigent defense counsel, prosecutorial and probation services.

19. What are the impacts on health and human service agencies related to social problems related to gambling, e.g. gambling addiction and substance abuse?

20. Which food facility standards will apply, and how will the project ensure compliance?

21. Which public swimming pool standards will apply, and how will the project ensure compliance?

AG RESOURCES

1. Evaluate the impact of permanently removing the acreage from agricultural production.

2. How will the project affect the existing and potential future neighboring agricultural operations?

3. Describe the quality of the agricultural soils for agricultural production and how susceptible surrounding agricultural operations are to economic pressure to convert to non-agricultural uses.

AIR QUALITY AND NOISE

1. Evaluate the emissions of criteria pollutants from the expected casino traffic and construction activities and compare to BAAQMD thresholds.

2. Evaluate cumulative traffic emissions for year 2020 (with County General Plan projections).

3. Would cumulative traffic cause carbon monoxide concentrations to exceed state standards at congested intersections and on area roadways?

4. What are the impacts of these emissions on neighbors surrounding the project?

5. Will there be any on-site emissions generated during construction or as a result of ongoing operations? If so, specify the emissions and evaluate their impacts.

6. Evaluate noise from construction and operation of the project. Consider transportation-related noise in this analysis. When evaluating noise impacts in the unincorporated area, use the standards established in the Sonoma County General Plan (See Noise Element of General Plan in Attachment 3).
   - For non-transportation noise, exceedance of the standards given in Table NE-2 of the Noise Element would be a significant impact.
   - For transportation noise, the following would constitute a significant impact: (1) an increase of more than 3 dBA Ldn at any sensitive receptor at which the existing noise level is greater than 60 dBA Ldn but less than 65 dBA Ldn; or (2) a measurable increase in the noise level at any sensitive receptor at which the existing noise level is 65 dBA Ldn or greater.
   - "Sensitive receptors" include homes, schools, churches, and hospitals.
   - A "measurable increase" in the noise level is the smallest increment that can be reliably measured by a certified ANSI/CEI Type I noise meter in field conditions.
   - A substantial permanent increase in ambient noise levels in the project vicinity is defined as an increase of 5 dBA Ldn or greater.

BIOLOGICAL RESOURCES

1. Evaluate potential impacts on sensitive species.

2. Evaluate loss of sensitive habitat, especially seasonal wetlands and riparian corridors, and of all county designated biotic resources that may be present on-site and in the surrounding area (including the Laguna de Santa Rosa).

GEOLOGY, SOILS AND TOPOGRAPHY

Evaluate the potential for exposing people to seismic hazards, especially seismic shaking and liquefaction. Consider the physical properties of the soils with regard to suitability for building foundations, septic systems, and other wastewater treatment and disposal methods.

HISTORICAL AND ARCHAEOLOGICAL RESOURCES

Identify any historical, prehistoric or paleontological resources and uses on-site and evaluate project impacts on these resources. Consult with the Northwest Information Center at Sonoma State University.

LAND USE AND AESTHETICS

1. Evaluate potential conflicts with the goals, objectives and policies of the County's General Plan, including impacts of development outside of the urban service area and inside the County's designated Community Separator. This analysis should address the land use and economic pressures that will result from the location of the project in an agricultural area on the urban fringe and the potential increase in demand to locate similar and related uses on surrounding land planned for agriculture or other rural uses. The analysis should specifically consider the effect of expanded roadway and utility capacity in this area. How would those impacts be mitigated to ensure that surrounding areas are protected from encroachment of additional urban uses?

2. Evaluate potential conflicts with the Countywide Transportation Plan and Regional Transportation Plan. Particular attention should be paid to the potential secondary growth inducing effects of providing new or expanded roadway access to the casino on the rural lands in the area along Stony Point Road, Wilfred Avenue, and Rohnert Park Expressway.

3. How will the project affect the visual character of the rural area/community separator?

4. How will casino lights affect the nighttime visual character of the area?

5. How will the lights affect neighboring uses?

6. Provide visual simulations of the project, including views from scenic corridors and scenic highways designated in the County General Plan, as well as along community gateways/ entryways. Refer to the County's methodology and thresholds of significance for visual impacts (Attachment 7).

SOCIO-ECONOMIC CONDITIONS

1. Evaluate the project's need for employees and the portion that would likely be from out of the local area. Describe the number of jobs to be filled, wage levels and benefits offered, experience levels required, training programs needed or non-Tribal workers to fill the shortfall.

2. Determine the potential need for housing for employees at all income levels.

3. What is the impact of the project on housing availability in the affected area, including housing for very low, low and moderate income households?

4. What is the impact of the project on child care availability?

ALTERNATIVES

The environmental document should evaluate project alternatives that substantially reduce the potential impacts, including at least one reduced-scale alternative for the project, as well as at least two alternative sites located elsewhere in the tribe's aboriginal range. An alternative for tribal trust land that is consistent with local General Plans (i.e. on a site designated and zoned for commercial use) and an alternative that does not include gaming should also be considered. These alternatives should be evaluated along with a No Project Alternative. Other alternatives should be evaluated in the context of the impact topic areas (aesthetics, transportation, water quality and hydrology) including: siting and access options at the proposed site; types of wastewater disposal systems; and, the provision of alternate water supplies and/or offsets to the water supply system (i.e. offsetting existing nearby urban irrigation uses to allow for increased groundwater use).

CUMULATIVE IMPACTS

The analysis should consider project impacts that might be cumulative with other foreseeable projects in the vicinity. For cumulative impacts to traffic, groundwater, flooding, and wastewater disposal, the analysis should consider long term, as well as the immediate future. Long term would include buildout in accordance with land use maps of the County General Plan and the various city General Plans.

ATTACHMENTS:

Attachment 1: County staff's guidelines for traffic reports

Attachment 2: County staff's proposed standards for package treatment plants

Attachment 3: Sonoma County General Plan, Public Safety Element. Chapter 7B of the Sonoma County Code, and Articles 56 and 58 of Chapter 26 of the Sonoma County Code (F1 and F2 Combining Districts). A copy of the Sonoma County General Plan is located on the following website: http://www.sonoma-county.org/prmd Click on "General Plan Update"

Attachment 4: Sonoma County Water Agency's flood control design criteria

Attachment 5: Sonoma County Fire Code

Attachment 6: Sonoma County Building Ordinance

Attachment 7: County staff's guidelines and methodology and thresholds of significance for visual impacts

ATTACHMENT 1
COUNTY OF SONOMA
GUIDELINES FOR TRAFFIC STUDIES

INTRODUCTION

The Permit and Resource Management Department (PRMD) and the Department of Transportation and Public Works (DTPW) are both responsible for the review and condition of private development projects. Traffic related conditions must be based on an analysis of the potential traffic impacts that establish a reasonable nexus between the impacts of the project and the required improvements or conditions. Conditions requiring traffic improvements must be roughly proportional to the impact of the project and/or reflect a fair share contribution toward improvements related to cumulative impacts. Recent case law has determined that conformance with adopted standards and/or payment of impact fees may not in and of itself provide sufficient mitigation.

TRAFFIC STUDIES

A traffic study report prepared by a registered traffic engineer will be required when it appears that the criteria or any of the thresholds of significance identified below will be exceeded. The traffic study and any required peer review shall be provided at the sole expense of the applicant. Applications for development permits are considered incomplete until all required information is submitted and accepted as accurate and complete by PRMD. Peer review of traffic reports is required on all project affecting State highways and may be required of any traffic study submitted by the applicant at the discretion fo the PRMD or DTPW. Alternatively, the County may contract directly for a traffic study on behalf of an applicant and charge the cost to the applicant without requiring a peer review.

A previous traffic study for the development under review will only be acceptable if it is less than two (2) years old and only if the context in the general area has not changed significantly i.e. new development, changes in roadways, land use or area plans have not occurred since preparation of the report.

The format and content of a traffic study should follow the outline provided in Attachment A, unless a different scope of work is approved by both PRMD and DTPW. If the project affects a State highway, Caltrans minimum requirements must also be included as defined in Attachment B. *[This attachment available from Caltrans website listed on page 5, Thresholds #1.]*

Examples of when traffic studies are required include:

1. A traffic study will generally be required when it appears that the thresholds of significance identified above will be exceeded. In almost all cases where trip generation during the peak hour is expected to exceed 50 vehicles a traffic study will be required. A previous traffic study for the development under review will only be acceptable if it is less than two (2) years old.

2. Proposed developments in study areas where roads, highways or intersections have an existing level of service that is at or below LOS-C.

3. Project traffic would utilize a substantial portion of an intersection(s) capacity

where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D or lower. Refer to Traffic Thresholds in Attachment C.

4. A new land use or change in an existing use that generates a large volume of traffic over 250 average daily trips (250 ADT) or over 25 residential units.

5. When the project adds traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structures) or receives use which would be incompatible with substantial increases in traffic (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic. Exceedence of the roadways designated Circulation Element Capacity may indicate the potential for the occurrence of the above impacts.

A focused study may be required in the following circumstances:

1. Limited sight distance.
2. Frequent accident history.
3. Where access is provided within 300 feet of an intersection.
4. Where the speed of traffic or limited capacity of the roadway or intersection indicates a need for turning lanes and/or acceleration or deceleration lanes.
5. Project access to a major road or arterial road would require a driveway that would create an unsafe or a new traffic signal or major revisions to an existing traffic signal.

TRAFFIC IMPACT ANALYSIS REQUIREMENTS FOR PRIVATE PROJECT REVIEW

Criteria	Yes	No	Type of Traffic Analysis Required
A. Is the proposed project located on or accessed from a State Highway?			If Yes, a Trip Generation Analysis is Required and answer A1 and A2.
1. Is the state highway or area intersections operating at LOS D or worse?			If Yes, then a Full Traffic Study is required. If No, then answer A2.
2. Will the project generate over 50 Average Daily Trips (ADT)?			If Yes, then a Focused Traffic Study may be required.
B. Is the project located in a study area where one or more streets or intersections are operating at LOS D or worse?			If Yes, then a Full Traffic Study is required?
C. Is the proposed project located in a study are where streets and intersections are currently operating at LOS C or better?			If Yes, then a Trip Generation Analysis is required and response to questions C1 through C6 below.
1. Is the proposed project anticipated to generate less than 25 vehicle-trips in the critical peal hour?			If Yes, no further traffic analysis is required.
2. Is the proposed project anticipated to generate more that 25 but less than 50 vehicle-trips in the critical peak hour?			If Yes, only a Focused Traffic Study is required.
3. Is the proposed			If Yes, conduct a Full Traffic Study.

	project anticipated to generate more than 50 vehicle-trips in the critical peak hour?			
4.	Is the project located in an area with potential hazard conditions?			If Yes, a Focused Traffic Study is required.
5.	Is the proposed project anticipated to have a significant effect on the environment and may require an Environmental Impact Report (EIR)?			If Yes, a Full Traffic Study is required for incorporation into an EIR.
6.	Is the proposed project not easily categorized into one of the above categories?			If Yes, contact the Permit and Resource Management Department (PRMD) and the Department of Transportation and Public Works (DTPW) for assistance

TRAFFIC STUDY PROTOCOL

A meeting with staff from PRMD and DTPW is recommended prior to beginning the study to define the required area and scope. If the project is located on or near a State highway consultation with Caltrans is also necessary. A meeting with staff from the DTPW is recommended prior to beginning the study to define the required scope. Topics for discussion should include study area, location and timing or traffic counts, trip generation, directional distribution of traffic, trip assignment, intersection analysis and methods of projection of build-out volume. The traffic study should include analysis of adjacent local roadways and intersections located in the vicinity, including all intersections which are operating near or below thresholds in the general area. Traffic studies should also identify and evaluate the nearest access to State highways or nearest major County roadway.

Five (5) copies of the study shall be submitted to PRMD and one (1) copy shall be submitted to DTPW-Land Development Division Manager. The report will be referred to Caltrans and other agencies (i.e. SCTA, affected cities) for comment. Once accepted by PRMD and DTPW, the traffic study will be incorporated into the environmental document for the project. The environmental document will then be made available for public review and circulated to responsible agencies prior to the hearing date.

TRAFFIC IMPACT ANALYSIS METHODS

1. Study Area: Traffic studies must identify the study area including the nearest access to State highways or major County roadways in the vicinity. If the area is significantly affected by existing regional traffic patterns, then a larger study area may be needed to adequately address the traffic issues.

2. Methodology: Traffic studies should utilize current methods and practices as defined by Caltrans in the most recently adopted "Guide for the Preparation of Traffic Impact Studies" and the most current Institute of Transportation (ITE) trip generation rates or other measured counts as approved by DTPW.

   The "Florida Guidelines" available at DTPW provide pre-calculated tables for different roadway configurations that may be used for an initial determination of delay on existing roadways.

3. Future Roadway Improvements: All assumptions used in the analysis must be clearly stated in the report. Planned roadway improvements shall only be included in the traffic analysis if the improvement project has been fully funded and programmed for construction. The traffic report must identify the specific improvements, funding source and time-frame for completion of any included roadway improvements.

4. Future Land Use: Projection of future land uses and development should be made in consultation with planning staff at PRMD. A minimum 10-year growth projection is required for an interim evaluation and 20-year growth projection is required for cumulative impact analysis. The analysis must identify projects in the study area that have been approved but not yet built, projects that are pending approvals, as well as general projections of growth within or affecting the study area. A tabulation of land uses by type and parcel number with the respective trip generation rates must be identified.

THRESHOLDS

1. State Highways: The impact of a project on a State highway shall be evaluated based on criteria established by Caltrans in the "Guide for the Preparation of Traffic Impact Studies", as amended from time to time (provided in attachment B or available on the internet at:

http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

   Additionally, for analysis of cumulative impact, the "Traffic Impact Thresholds of Significance Criteria" for the County road systems identified in attachment C shall be used to supplement Caltrans standards on State highways.

2. County Roads: Traffic Impact Thresholds of Significance Criteria "for evaluating

traffic impacts on County roadways are defined in attachment C. The County's standard for roadway segments is to maintain LOS C on the County roadway system as defined in the Sonoma County General Plan. The standard for intersections is to provide LOS D or better at build-out of the General Plan. Projects which take up significant existing reserve capacity at an intersection may have a significant traffic impact if the cumulative analysis indicates that the LOS deteriorates below the County standards.

3. Mitigation Measures: In order to reduce project impacts to levels of insignificance the proposed mitigation measures must result in post-development affected intersections and roadways that have an LOS that is no worse than the pre-project LOS; reduce safety impacts to insignificance by bringing the site up to Caltrans design standards; and provide adequate parking and alternative transportation facilities consistent with County plans and policies. The scope of the mitigation measures must reduce the project's impact below the identifiable thresholds found in Attachment C.

   The payment of countywide traffic impact fees in and of itself may not be adequate to mitigate a project's local impacts if the existing facilities are already below standard and the required improvements are not fully funded or programmed to be operational at the time of the project's completion. The timing of the implementation of the mitigation measure may require off-site improvements to be constructed by the developer using a Reimbursement Agreement to pay for any oversized facilities associated with the public share of the improvement pursuant to Section 26-670 of the Sonoma County Code. Fees do not cover project specific impacts related to a particular project.

   The project's contribution to cumulative impacts must also be addressed in proportion to the project's impact. A proportional fair share contribution to a traffic improvement related to a cumulative impact may be required based on the Methodology for Calculating Equitable Mitigation Measures included in Caltrans "Guide for the Preparation of Traffic Impact Studies" provided in attachment B.

   Mitigation measures for both project impacts and cumulative impacts must be implemented prior to occurrence of the impact. An analysis of the timing, funding and responsibilities for implementation of mitigation measures should be included in the traffic study.

   Payment of the countywide traffic impact fee only mitigates or addresses cumulative countywide impacts related to projects that are programmed or listed to be funded by the fees on file with DTPW.

4. Peer Review: The County may require a peer review of any traffic report submitted by an applicant. The full cost of any traffic studies, required revisions, supplemental reports or peer reviews shall be borne by the applicant. Peer review of traffic reports will be required on all projects affecting a State highway.

ATTACHMENTS

A. Standards for Traffic Studies
B. Caltrans "Guide for the Preparation of Traffic Impact Studies", June 2001
C. Traffic Impacts Thresholds of Significance Criteria.

ATTACHMENT 1-A
COUNTY OF SONOMA
STANDARDS FOR TRAFFIC REPORTS

INTRODUCTION

A traffic study report may be required to assess impacts of developments on existing and/or planned roads. A registered Traffic Engineer shall prepare the traffic study. The County will require a Traffic Study whenever it is determined that a proposal may have a significant, but undetermined impact on the flow of public traffic. A Traffic Study more than two years old shall be updated unless the Public Works Department determines conditions have not significantly changed.

A meeting with the Department of Transportation and Public Works is recommended prior to beginning the study. Topics for discussion could include study area, trip generation, directional distribution of traffic, trip assignment, intersection analysis, and methods of projecting build-out volume.

Five (5) copies of the study shall be submitted to the Permit and Resource Management Department (PRMD). The report will be referred to the Department of Transportation and Public Works and Caltrans for review and approval. Once accepted by the reviewing agencies, the traffic study will be incorporated into the environmental document for the project. The Department shall be free to use an approved Traffic Study for any purpose whatsoever.

Calculations, assumptions and supporting data for the conclusion presented in the Traffic Study shall be submitted as part of the Traffic Study. The calculations shall be comprehensive and easily understood.

Maps and graphs shall be to scale and must include dimensioned road geometrics (e.g., width, radii, etc.). Intersection geometrics shall include bus stops, parking areas, pedestrian crossings, driveway restrictions, etc.

Daily trips may be reduced by allowing for public transit when a transit stop is located within one thousand (1,000) feet of the development. The maximum reduction allowed is five (5) percent. Transit reductions do not apply to hotels, restaurants, retail, or financial uses. Pass-by factors may be used for retail oriented development upon approval of the Department of Transportation and Public Works.

Revisions to the Traffic Study shall be made when required by the Permit and Resource Management Department or the Department of Transportation and Public Works. The need for revisions could be based on completeness, accuracy, consistency with standards, impact evaluation methodology and assumptions, and compatibility of the access or development plan, or other considerations. Methodologies shall conform to those found in the Caltrans "Guide for the Preparation of Traffic Impact Studies", a copy of which is found in this manual.

TRAFFIC STUDY FORMAT AND CONTENTS

Traffic studies shall be organized and present all required information using the format, content,

and standards described below. A consistent format and standard will provide for easier comparison and evaluation of the report by County staff, and decision-making bodies, thus allowing for quicker review. Traffic reports must clearly state all assumptions and references used.

REQUIRED CONTENTS FOR FOCUSED TRAFFIC STUDY

If the proposed project is estimated to generate less than 50 vehicles-trips in the critical peak hours, a focused site traffic study may be required in consultation with staff from DTPW. The study shall adhere to the following guidelines:

The project applicant shall retain a professional traffic engineer or civil engineer, who is licensed to practice Traffic Engineering in the State of California. Said engineer consultant shall conduct qualitative and/or quantitive analysis and submit a written "Focused Site Traffic Review" on each of the following areas that apply to the proposed project. Please note that when a concern is identified, the Traffic Engineer shall propose a solution:

Frontage Improvements: Identify and discuss all aspects of the road fronting the proposes project, which do not meet the County's minimum standards for roadways or driveways.

Parking: Discuss the parking associated with the proposed project compared with County Standards that are or may be found inadequate.

Emergency Access: Discuss proposed site designs that (may) result in inadequate emergency access.

Road Hazards: Discuss any anticipated substantial increases in potential hazards due to a design feature (e.g., sharp curves or dangerous intersections) or any perceived incompatible uses (e.g., farm equipment).

Vehicle Queues: Identify situations where the addition of project vehicles or pedestrian traffic cause the 95th percentile queue length to exceed existing roadway turn-lane storage capacity.

Signal Warrants: Identify situations where the addition of project vehicles or pedestrian traffic will cause an intersection to meet or exceed Caltrans signal warrant criteria.

Turn Lanes: Identify situations where the addition of project traffic at an intersection, including project driveways, causes an intersection to meet or exceed criteria for provision of a right or left-turn lane on an intersection approach.

Sight Distance: Identify situations where the proposed project add traffic to an existing un-signalized intersection(s), including project related driveways that have inadequate sight distance based on Caltrans and County criteria.
Pre-Project Traffic Concerns: Identify and discuss any current traffic problems in the

local area, such as, high accident locations (if this applies, include a collision diagram(s) and accident rate analysis) or confusing intersections.

Neighborhood Traffic Sensitivities: Identify and discuss the sensitivities of adjacent neighborhoods or other areas that may be perceived as adversely impacted by the proposed project.

Site Driveways: Identify and discuss proposed or existing site driveway(s) that are in close proximity to other driveways or intersections that are adversely impacted by the proposed project.

Transit Operations: Identify and discuss the potential for the proposed project to adversely impact transit operations.

Pedestrian Operations: Identify and discuss the potential for the proposed project to adversely impact pedestrian safety and the adequacy or nearby pedestrian facilities.

Bicycle Operations: Identify and discuss the potential for the proposed project to adversely impact bicycle safety and the adequacy or nearby bicycle facilities.

Alternative Transportation Policies: Identify and discuss aspects of the proposed project that are/may be in conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks, etc.).

Truck Operations: When it is anticipated that the number of truck deliveries and service call will exceed an average of 10 per day, discuss the ability of the proposed project's site design to adequately handle truck loading demand and traffic circulation. Discuss excessive wear and tear associated with ongoing truck operations on County roadways.

Response to Expressed Concerns: Respond to traffic circulation comments on the proposed project that have been received others, including public agencies (e.g., Caltrans, Cities, SCTA).

Level of Service: Identify existing, projected and cumulative conditions, including documentation of all assumptions or land use and planned improvements.

REQUIRED FORMAT FOR FULL TRAFFIC REPORTS

I. TITLE PAGE

II. TABLE OF CONTENTS

III. EXECUTIVE SUMMARY

IV. INTRODUCTION/STUDY PARAMETERS

- A. Description of the proposed project
- B. Study area, circulation network and land use
- C. Operating scenarios and hours to be evaluated
- D. Description of methodologies and assumptions
- E. Operating standards

V. TRAFFIC ANALYSIS

- A. Existing conditions
- B. Accident history and evaluation
- C. Future conditions
  1. Project generated trips
  2. Project generated trip distribution
  3. Existing and project conditions
  4. Cumulative conditions without project
  5. Cumulative conditions with project
- D. Site access evaluation

VI. SUMMARY OF CONCLUSIONS

VII. RECOMMENDATIONS

VIII. APPENDICES

- A. Description of traffic data and how data was collected
- B. Worksheets used in analysis (i.e. signal warrant, LOS, traffic count information, etc.)
- C. Other supporting information (i.e. written consultation with agency staff)

REQUIRED CONTENTS FOR FULL TRAFFIC REPORTS

I. TITLE PAGE

A. Project name and location
B. Project sponsor and contact person
C. Person/organization preparing the report and contact information

II. TABLE OF CONTENTS

A. Study outline
B. List of figures
C. List of tables

III. EXECUTIVE SUMMARY

A. A summary description of the scope of the study.
B. A summary description of the development, including a description of each of its components and the size of each of the components.
C. A summary of the traffic generated by each of the development's components.
D. Descriptions of the primary access route(s) to the development site.
E. A description of the access point to the development site.
F. A description of the study area, including identification of the study area roads.
G. A description of the study area land use and zoning
H. The summary shall include a brief discussion of the findings, mitigations, and recommendations of the study.

IV. INTRODUCTION/STUDY PARAMETERS

A. Description of the proposed development
   1. Project location
   2. A description of the existing use of the development site.
   3. A description of the project including the project purpose or goal and planned completion date or phasing.
   4. A description of each of the project's components, including the size of each component and operating characteristics.
   5. Site plan (figure) with dimensions showing the proposed development, including all parking and access driveways, easements and pedestrian access.

B. Study area, circulation network and land uses
   1. A description of the study area limits, including the roadways and intersections to be studied along with the reasoning behind the choice of the study area limits.
   2. A map of the study area illustrating the circulation network, including all access to state and local roadways.

3. Maps depicting both existing and proposed land uses and zoning in the study area.
4. Table identifying all existing, approved and proposed developments, in the study area.
5. References to other traffic studies.

C. Operating scenarios and hours to be studied
1. A description of the operating scenarios that will be considered in the report and the reasoning behind the selection of these scenarios.
2. A description of the hours of operation that will be considered in the report and the reasoning behind the selection of these hours. Include separate statements on weekday activities and weekend activities.
3. Phasing plan including proposed dates of project completion.

D. Description of methodologies and assumptions
1. Describe the methodologies used in the traffic study (methods must conform to those found in the Caltrans "Guide for the Preparation of Traffic Impact Studies", unless otherwise approved by the Department. A copy of the Caltrans guide can be obtained from: http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/
2. Description of all assumptions and the basis or rationale including all land use projections and assumed roadway improvements.
3. Description the assumptions used in calculating LOS for each intersection and each roadway segment.

E. Operating standards
1. Define level of service (LOS) operating standards and thresholds of significance, (standards must conform to the CEQA guidelines and thresholds provided in Attachment B "Caltrans Guide" and Sonoma County "Traffic Impact Thresholds" provided in Attachment C).
2. Define the projected horizon (year) for the assessment.
3. Describe roadway capacity criteria.
4. Determine volume to capacity ratios.

V. TRAFFIC ANALYSIS

A. Existing conditions
1. The existing surrounding land uses that affects the development.
2. A list of prior traffic studies.
3. Traffic circulation system within the study area, including traffic controls at key intersections.
4. Key road geometric features affecting the proposed development, including roads, intersections, storage lengths and the existing access to the project site.
5. Describe existing deficiencies on roads that will be used by the project.
6. Posted speed limits within the study area.
7. Existing daily traffic counts and turning movements within the study area

and the source of this information.

8. Trip generation for the existing use of the site, if any.
9. Roadway segment traffic counts within the study area.
10. Intersection traffic counts at key intersections and the source of this information.
11. Estimated pedestrian activity.
12. Estimated bicycle activity.
13. Estimated transit activity.
14. Queuing analysis.
15. Existing level of service conditions including both in terms of seconds of delay and letter LOS designation for the existing site with no project in accordance with current Caltrans methods and practices. Provide this information for key intersections and road segments in the study area. Provide the source of this information.
16. A map showing the above features.

B. Accident history evaluation
   1. A tabulation of accidents for the most recent years within the study area.
   2. A comparison of the accident rate with statewide averages for similar situations.

C. Future conditions
   1. Project generated trips
      a. Each component of the development that generates new trips.
      b. The size of each traffic generating component of the development.
      c. Average one-way trip generation rates for each traffic-generating components of the proposal (daily and peak hour).
      d. ADT generated by project during work week.
      e. ADT generated by project during weekend.
      f. Peak hour trips generated by project during a work week.
      g. Peak hour trips generated by project during peak weekend day.
      h. Percentage pass-by traffic (if applicable).
      I. Winery tasting room traffic (if applicable).
      j. Special events matrix showing special events by type, timing of traffic movements related to each event type and volumes of traffic associated with each event type.
      k. Trip generation rates shall be taken from the Institute of Transportation Engineer's (ITE) "Trip Generation Manual" report. Upon approval of the Department of Transportation and Public Works rates from other sources (e.g., Caltrans) or traffic counts from similar uses may be used. For mixed-use developments, combined ITE rates may be used to estimate average daily traffic.
      l. Trip generation for the proposed use shall be calculated for the highest use or worst case scenario allowed under the proposal. If the development is staged, the trip generation related to full development shall be used for the analysis.
      m. Separate trip generation figures shall be provided for truck traffic

and non-truck traffic related to the development.

n. Peak hour may be estimated by using ten (10) percent of average daily traffic upon approval of the DTPW.
o. Passerby factors may be used upon approval of the DTPW.
p. Internal trip reductions and modal split assumptions require analytical support and approval from the DTPW.
q. Estimated trip generation from known future developments within the study area.
r. Volume projections for background traffic growth may be available from the DTPW.
s. A map(s) showing the above information.
t. Parking analysis.
u. Describe truck operations and excessive wear and tear associated with truck traffic.

2. Project generated trip distribution
   a. Discuss trip distribution and assignment for the access to the development and for intersections in the vicinity of the development, including the direction and percentage trip distribution for trips entering the development and the direction and percentage trip distribution for trips exiting the development.
   b. Provide a discussion of survey data (e. g., origin-destination surveys) to support these estimates.
   c. Provide market studies, area planning, council data, driveway counts at adjacent developments or other information (e.g., origin-destination surveys) to support these estimates.
   d. A map(s) showing distribution of trips between the development and destinations.

3. Existing and project condition
   a. Projected daily traffic volumes with existing and the proposed development, including turning movements, facility geometry (including storage lengths) and traffic controls (including signal phasing and multi-signal progression where appropriate).
   b. Projected level of service and warrant analysis.
   c. Potential impact of project on key intersections including entrance(s) to the site (percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   d. Potential impact of project on key roadway segments serving the proposal. This information should be presented in terms of percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   e. The impact of this condition on volume to capacity ratios.
   f. Adequacy of on-site parking.
   g. Adequacy of provisions for pedestrians, bicycles, emergency access, and loading areas.

4. Cumulative conditions without project
   a. A listing of approved and reasonably foreseeable future developments within the study area.
   b. Estimated trip generation from anticipated future developments within the study area.
   c. Projected daily traffic volumes with existing and anticipated development (existing + other known or anticipated development) include turning movements, facility geometry (including storage lengths) and traffic controls (including signal phasing and multi-signal progression where appropriate).
   d. Traffic volume projections for background traffic growth.
   e. Potential impact on key intersections including entrance(s) to the site. Percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   f. Potential impact on key roadway segments serving the proposal. This information should be presented in terms of percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   g. The impact of this condition on volume to capacity ratios.

5. Cumulative conditions with project
   a. Projected daily traffic volumes with the project and existing and anticipated development within the study area (existing + project + other known or anticipated development) including turning movements, facility geometry (including storage lengths) and traffic controls (including signal phasing and multi-signal progression where appropriate).
   b. Traffic volume projections for background traffic growth.
   c. Potential impact on key intersections including entrance(s) to the site (percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   d. Potential impact on key roadway segments serving the proposal. This information should be presented in terms of percentage volume increase and impact on level of service conditions in both seconds of delay and letter LOS designation.
   e. The impact of this condition on volume to capacity ratios.

D. Site access evaluation
   1. Discuss requirements for the access to the development.
   2. Discuss the impact of access to the project on adjoining neighborhoods.
   3. Provide a left-turn ingress analysis.
   4. Provide a right-turn/deceleration ingress turn analysis.
   5. Provide a left-turn egress acceleration lane analysis.
   6. Provide a right-turn/acceleration lane egress turn analysis.
   7. Provide a sight-distance analysis.

VI. SUMMARY OF CONCLUSIONS

A. Identify and describe potentially significant adverse impacts without mitigation measures.

1. Intersection(s) with peak-hour level of service.
2. Road segments with peak-hour level of service.
3. Project generated increases in traffic that exceed the LOS or delay thresholds as outlined in Attachment B or C.
4. Cumulative increases in traffic that exceed the LOS or delay thresholds outlined in Attachment C.
5. Unsafe access point(s) to the development.
6. Unsafe primary access route(s) to the development. (e.g., substandard width for traffic volume carried, side ditches, sharp curves, poor sight distance, inadequate pavement, inadequate intersections).
7. Miscellaneous other unsafe conditions.
8. Adverse impacts on pedestrian and bicycle movements.
9. The need for a traffic signal(s) shall be justified by identifying which, if any, Caltrans Traffic Manual signalization warrants is met.
10. Temporary construction impacts.
11. Adequacy of on-site parking.
12. Adequacy of provisions for pedestrians, bicycles, emergency access, and loading areas.
13. Summarize impacts in a table/matrix.

VII. RECOMMENDATIONS

A. The study shall recommend improvements or revisions to the project to mitigate each of the adverse impacts. Improvements and/or mitigation measures shall maintain peak-hour level of service "C" or better on roads and state highway facilities and a peak-hour level of service "D" or better at local intersections. The recommendation should include:

1. Descriptions of each recommended improvement and the timing, phasing plan or required thresholds for implementing the improvement.
2. Map(s) or schematic drawings of the recommended improvements.
3. Dimensioned diagrams of the nature and extent of recommended improvements.
4. An analysis of the timing, funding and responsibilities for implementation of mitigation measures.
5. Define responsibilities for implementation of mitigation measures and funding source. Differentiate between improvements to be constructed by the developer and those to be constructed by others, including government agencies. Explain how each improvement mitigates the related adverse impact.
6. Countywide impact fees can be identified as funding of mitigation measures only if the specified improvement is included in the fee program list.
7. Define the fair share allocation as a percentage for traffic related improvements involving several developments using the "Methodology for

Calculating Equitable Mitigation Measures" included in Caltran's "Guide for the Preparation of Traffic Impact Studies" provided in Attachment B.

VIII. APPENDICES

A. Data collected for the study including traffic counts (e.g., average daily, peak hour turning movements) and work sheets.
B. Projected land use assumptions (table).
C. References.
D. Study participants and persons contacted.
E. A completed winery trip generation form (if applicable).
F. A completed special events trip generation form (if applicable).

ATTACHMENT 1-B
COUNTY OF SONOMA
CALTRANS "GUIDE FOR THE PREPARATION OF TRAFFIC IMPACT STUDIES," JUNE 2001

This document is available on the internet:

http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

ATTACHMENT 1-C
COUNTY OF SONOMA
TRAFFIC IMPACT THRESHOLDS OF SIGNIFICANCE CRITERIA

SIGNIFICANCE CRITERIA FOR PROJECT-LEVEL IMPACTS

The project would have a significant traffic impact if it results in any of the following conditions:

1. On-site roads and frontage improvements: Proposed on-site circulation would not meet the County's minimum standards for roadway or driveway design, or, in the opinion of the registered traffic engineer conducting the study, result in safety hazards.

2. Parking: Proposed on-site parking supply would not be adequate to accommodate parking demand.

3. Emergency Access: The project site would have inadequate emergency access.

4. Policies and Plans: The project conflicts with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

5. Road Hazards: Hazards are increased due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

SIGNIFICANCE CRITERIA FOR BOTH PROJECT LEVEL AND CUMULATIVE IMPACTS

The following criteria are used to determine both project-level and cumulative traffic impacts. The impact would be significant if:

1. Vehicle Queues: The addition of project traffic causes the 95th percentile queue length to exceed roadway turn lane storage capacity [1].

2. Signal Warrants: The addition of project vehicle or pedestrian traffic causes an intersection to meet or exceed Caltrans signal warrant criteria.

3. Turn Lanes: The addition of project traffic causes an intersection to meet or exceed criteria for provision of a right or left turn lane on an intersection approach [2].

4. Sight Lines: The project constructs an unsignalized intersection (including driveways) or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based upon Caltrans criteria for state highway intersections and County criteria for County roadway intersections.

5. County Signalized Intersections: The project would have a significant impact if project traffic would cause an intersection currently operating at an acceptable level of service (LOS A, B, C, or D) to operate at an unacceptable level (LOS E or F).

   There would be a significant cumulative impact if the operation of an intersection is worse than LOS D in the existing base case, or if future cumulative peak hour traffic

would cause the intersection operation to become worse than LOS D.

If there is a significant cumulative impact as described above, then the project-related traffic is considered to be a significant impact that is cumulatively considerable if it exceeds the delay or volume thresholds listed in Table 1 below. LOS and delay apply to the entire intersection.

TABLE 1
CUMULATIVE IMPACT THRESHOLDS
COUNTY SIGNALIZED INTERSECTIONS

If the existing or Base Case (without project) LOS is:	Then the existing control delay per vehicle is:[3]	The project's cumulative impact is considered significant if the increase in control delay associated with the project is:
A	10 seconds or less	10 seconds
B	10.1 to 20 seconds	10 seconds
C	20.1 to 35 seconds	7.5 seconds
D	35.1 to 55 seconds	7.5 seconds
E	55.1 to 80 seconds	7.5 seconds or 40 vehicle trips [4]
F	Greater than 80	5 seconds or 25 vehicle trips [4]

6. <u>County Unsignalized Intersections</u>: The following criteria apply to all-way stop sign controlled or side street stop sign controlled intersections on County roads. The criteria do not apply to low volume roadways [5].

The project would have a significant impact if project traffic would cause an intersection currently operating at an acceptable level of service (LOS A, B, C, or D) to operate at an unacceptable level (LOS E or F).

There would be a significant cumulative impact if operation of a County road intersection is worse than LOS D in the existing base case, or if future cumulative peak hour traffic volumes would cause the operation of the intersection to become worse than LOS D.

If there is a significant cumulative impact as described in the paragraph above, then the project-related traffic is considered to be a significant impact that is cumulatively considerable if it exceeds the delay or volume thresholds listed in Table 2 below. For all-way stop sign controlled intersections LOS and Delay apply to the entire intersection.

TABLE 2
CUMULATIVE IMPACT THRESHOLDS
COUNTY UNSIGNALIZED INTERSECTIONS [5]

If the existing or Base Case (without project) LOS is:	Then the existing control delay experienced by that movement or approach is:[3]	The project's cumulative impact is considered significant if the increase in control delay associated with the project is:
A	10 seconds or less	10 seconds
B	10.1 to 15 seconds	5 seconds
C	15.1 to 25 seconds	5 seconds
D	25.1 to 35 seconds	5 seconds
E	35.1 to 50 seconds	5 seconds (or 30 vehicle trips [6])
F	Greater than 50	5 seconds (or 20 vehicle trips [6])

7. County Mid-road Operation: The project would have a significant impact if project traffic would cause a road currently operating at an acceptable level of service (LOS A, B, or C) to operate at an unacceptable level (LOS D, E, or F).

There would be a significant cumulative impact if operation of a County mid-road segment is worse than LOS C in the existing base case, or if projected future peak hour cumulative traffic volumes would cause the operation of the mid-road segment to become worse than LOS C. This criterion does not apply if operation worse than LOS C has been found acceptable for that road in the Sonoma County General Plan, which allows lesser LOS on some roadways.

If there is a significant cumulative impact as described in the paragraph above, then the project-related traffic is considered to be a significant impact that is cumulatively considerable if it causes peak hour mid-road travel speeds to decrease by the amounts listed in Table 3 below.

TABLE 3
CUMULATIVE IMPACT THRESHOLDS
2-LANE COUNTY HIGHWAYS MID-ROAD LEVEL OF SERVICE

If the existing or Base Case (without project) LOS is:	Then the existing average travel speed is (miles per hour [mph]):[3]	The project's cumulative impact is considered significant if the decrease in average travel speed associated with the project is:
A	greater than 55 mph	5 mph
B	50-55 mph	4 mph
C	45-50 mph	3 mph
D	40-45 mph	2 mph
E	40 mph or less	1 mph
F		0.5 mph

8. Operation of State Highways:[8] The following criteria apply only to State highways. Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highways. If the existing operation of a State highway is worse than LOS C, the existing "measures of effectiveness" should be maintained. Measures of effectiveness are: (a) control delay per vehicle for signalized intersections; (b) average control delay per vehicle for unsignalized intersections; (c) average speed for two lane highways, and (d) density for multi-lane highways[9].

   A project would have a significant impact if the project-related traffic causes the operation of a State highway to become worse than LOS C. There would be a significant cumulative impact if operation of a State highway is worse than LOS C in the existing base case, or if projected future peak hour cumulative traffic volumes would cause the operation to become worse than LOS C.

Footnotes:

1. Based upon HCS analysis methodology for signalized intersections and formula contained in November 2001 ITE Article *(Estimation of Queue Length at Unsignalized Intersections)* for side street stop sign controlled intersections.

2. Based upon Caltrans criteria for state highways and TRB Circular 279 (*Warrants for Provision of Left Turn Lanes*) for county roadways.

3. As defined in the year 2000 Highway Capacity Manual. Note: The year 2000 Highway Capacity Manual refers to *average* control delay for side street stop sign controlled intersections.

4. Signalized Intersections: If the addition of project traffic results in a *reduction* (rather than an *increase*) in intersection control delay, evaluation should then consider significant if 40 or more project vehicle trips are added to an intersection operating at LOS E or 25 or more project vehicle trips are added to an intersection operating at LOS F.

5. LOS significance criteria do not apply to roadways with projected traffic volumes of less than 30 vehicles per hour per approach or per exclusive left turn movement.

6. Unsignalized intersections: If the addition of project traffic results in a *reduction* (rather than an *increase*) in average control delay for the critical approach or turn movement (or for the entire intersection for an all-way stop controlled intersection), the impact is significant if 30 or more project vehicle trips added to an intersection with one or more movements operating at LOS E or 20 or more project vehicle trips added to an intersection with one or more movements operating at LOS F.

7. The year 2000 Highway Capacity Manual does not provide an average travel speed breakpoint between LOS E and LOS F operation.

8. State Highway thresholds are based on *Caltrans Guide for the Preparation of Traffic Impact Studies*, State of California Department of Transportation, June 2001. The most recent version of this handbook may be found on the internet. (http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/)

9. Measures of effectiveness are defined in the most recent version of the *Highway Capacity Manual*, Transportation Research Board, National Research Council.

Attachment 2

PACKAGE TREATMENT PLANT POLICY AND PROCEDURE

PURPOSE This policy is intended to provide guidance to all staff when an application is submitted for a commercial or industrial use which proposes the use of a package sewage treatment plant for sewage disposal in cases where such plants are consistent with the General Plan. This policy will guide the environmental (CEQA) and technical review of projects which involve the use of a package treatment plant for sewage disposal.

GENERAL There has been increased interest in the use of package treatment plants for new development proposals in the County. Current review procedures are not presently clearly defined.

AUTHORITY 1) Policy PF-li of the Sonoma County General Plan which states: Consider approval of new wastewater management systems in unincorporated areas only when it is necessary to resolve an existing public health hazard. Avoid new small wastewater treatment systems which serve multiple uses under separate ownership on separate parcels.
2) California Plumbing Code Section 305.2 and 713.1
3) Sonoma County Code, Chapter 7

GENERAL

DEFINITION: A package treatment plant is a method of sewage treatment which uses a process involving energy and mechanical, biological, chemical or physical treatment of the wastewater to reduce Biological Oxygen Demand (BOD), suspended solids (SS), nitrogen (N), bacteria and other sewage constituents and which is of a degree of complexity that a certified wastewater treatment plant operator is required. It includes any proposal to use wastewater in a manner subject to Title 22 wastewater reclamation standards. It also includes any treatment unit other than a septic tank which processes more than 1500 gallons of wastewater per day. It does not include systems which process wastewater originating solely from agricultural uses, retail food facilities or storm water if these systems do not include any domestic wastewater component.

RESTRICTIONS ON USE: Package treatment plants cannot serve multiple uses on separate parcels under separate ownership unless the Board of Supervisors approves specific findings

for multiple ownership of sewage disposal systems. (General Plan Policy PF-li)

PROCEDURES

1. SUBMITTAL REQUIREMENTS FOR PERMIT APPLICATIONS (GENERALLY IN CONJUNCTION WITH A DISCRETIONARY PERMIT APPLICATION).

    1. The submittal request for a package treatment plant must be prepared by a Registered Civil Engineer with documented experience in the design of treatment plants (minimum of 5 years of experience in sewage treatment plant design or resume with 5 similar projects).

    2. A full description of the collection and treatment shall be provided. This shall include a discussion of the proposed method of treatment, disinfection, filtration, and other treatment process components. A description shall be provided of the level of treatment to be obtained and shall include, without limitation, projected levels for BOD, SS, N, total and fecal coliform, phosphorous, oils and grease and other characteristics both before and after treatment of the wastewater as well as any other information required by PRMD. Projected treatment levels need to be substantiated by an independent testing authority and documented experience under conditions similar to Sonoma County (including climate). The description shall include the need for sludge removal (frequency and quantity of sludge removal, method of storage, method of transport and method of disposal), energy use and a detailed discussion of compliance with Title 22 standards.

    3. A full description of the proposed wastewater disposal method shall be provided . This shall include an evaluation of soil conditions; groundwater conditions; groundwater movement; proximity to beneficial water uses such as wells, streams and drainage courses and consideration of contaminant travel in both ground water and surface water. The person performing this evaluation shall calculate the needed amount of wastewater storage and shall include a water balance that addresses proposed sewage volumes, rainfall, evaporation, acceptable discharge times and maintenance of freeboard in storage units. The land area necessary for the disposal system shall be calculated and identified on a site plan of the proposed development. If cut and fill is necessary, these shall be indicated on the plot plan together with identification of any off-site spoils disposal areas.

    A pond maintenance plan shall be submitted, if ponds are provided. This plan shall identify routine monitoring of the structural integrity of the pond, monitoring of freeboard, control of weeds and algae and control of vectors.

4. The long term managerial and financial needs shall be fully described. This shall include characterizing the persons responsible for maintenance and monitoring, their qualifications, training requirements and the expected costs of these activities. A 10 year financial plan for operation, maintenance and repair of the treatment plant shall be prepared which includes depreciation of equipment, expected replacement times for equipment components and the financial reserves necessary to meet these operational issues.

5. Package treatment plants will only be approved for single parcels. Use is limited to commercial or industrial uses.

2. ENVIRONMENTAL REVIEW OF PACKAGE PLANTS FOR CEQA COMPLIANCE OR FOR REVIEW OF REFERRALS FROM OTHER AGENCIES

Compliance with CEQA will require either an Initial Study/Negative Declaration or an Environmental Impact Report. The environmental document must address all of the impacts of the project and must include any information necessary for PRMD to complete a review of the proposed package treatment plant. The following impacts are especially relevant to package treatment plants and analysis of these impacts shall be included in the environmental document:

1. Noise- Operational noise impacts to neighboring residences with specific decibel readings submitted for equipment to be used, projections of noise levels to be expected at residences which may be impacted by increased noise levels, measurements of current night and day ambient sound levels at impacted residences and analysis of the project's compliance with the General Plan noise standards.

2. Odors and other air quality issues- Including a description of wind directions, inversion conditions, likely impacts on nearby receptors and odor control methods.

3. Vectors- Control of mosquitoes and other vectors in ponds.

4. Visual- An analysis of potential visual impacts of the treatment plant, ponds and irrigation areas particularly with respect to scenic corridors.

5. Soil erosion and roiling.

6. Geological and seismic stability of the treatment and disposal areas.

7. Potential health effects including a determination of source water protection areas for public water systems.

8. Groundwater protection including contaminant movement, changes in volume or quality of groundwater and analysis of potential discharge points for treated wastewater.

9. Alternative methods of sewage disposal- Complete description of all alternatives for the project including development of an on-site septic system, other types of treatment methods, development of off-site sewage disposal systems and connection to a public sewer system.

10. The size of the proposed package treatment plant must be considered in relation to potential growth inducing impacts.

11. Aerosols- Droplet sizes that will be generated, distance of travel of droplets, wind speed and wind direction.

12. Hazardous materials- Materials to be used in the treatment process and cleaning of treatment equipment including proper handling, storage and disposal.

13. Sludge disposal- Volume of sludge generated, location of on-site storage, frequency of removal, haul routes and volume to be hauled off-site.

14. Cumulative impacts.

15. Impacts on flood plains including the Flood Prone Urban Area.

16. Biological impacts including bird attraction.

17. Consultation with other affected agencies including Regional Water Quality Control Boards, Fish and Game, Coastal Commission, and nearby cities shall be described in the environmental document. The environmental document shall include sufficient analysis of impacts and mitigation measures to allow the other agencies to use it for CEQA compliance when they issue their permits for the project.

3. TYPICAL CONDITIONS OF APPROVAL FOR A PACKAGE TREATMENT PLANT

1. Plans for the treatment and disposal facilities shall be prepared by a Civil Engineer registered in the State of California. An independent engineering consultant acceptable to PRMD shall perform peer review of the plans at the applicant's expense. The design engineer shall inspect the construction and shall verify that construction was completed according to plans. Prior to any use of the treatment plant, a final letter shall be submitted to the County from the design engineer approving use of the treatment plant and verifying that it is in compliance with all State and local requirements.

2. The wastewater collection system shall be constructed in accordance with Sonoma County requirements for public sewage collection systems (County of Sonoma Sewage System Standards as adopted by Chapter 24, Sonoma County Code). A permit to construct the collection system shall be obtained from PRMD prior to the start of any construction of the collection system.

3. All applicable county permits shall be obtained for the treatment and disposal facilities including grading, electrical and plumbing permits.

4. Prior to obtaining building permits for any portion of the project, Waste Discharge Requirements shall be obtained from the appropriate Regional Water Quality Control Board.

5. Prior to issuance of building permits, deed restrictions shall be recorded specifying the conditions under which the package treatment plant was approved including the maintenance, management and financial obligations.

6. No permanent occupancy of any phase of the project shall occur until all of the wastewater treatment plant and disposal facilities have been constructed, approved by the design engineer, accepted by the Regional Water Quality Control Board, approved by Sonoma County PRMD and properly trained and licensed staff are available for operation.

7. The package treatment plant shall be operated under a valid Sonoma County operational permit in accordance with an approved monitoring plan

8. Use of the facility shall cease if either Waste Discharge Requirements or the County Operational Permit are revoked.

9. Prior to issuance of building permits, an emergency plan shall be developed that addresses the availability of back up personnel and actions to be taken in the event of treatment plant failure, pond rupture or overflow, effects of seismic events, unusual climatic conditions, and other similar events.

10. All mitigation measures specified in the environmental study shall be implemented as conditions of the project.

11. Connection shall be made to public sewer if and when it becomes available. Public sewer will be considered as being available if the parcel is in a sewer service area and when it has been constructed in a right of way or thoroughfare abutting the premises and is located within 200 feet of any building served by the package treatment plant or within 200 feet of any part of the sewage treatment/disposal system, provided that the sewer has capacity for the discharge from the premises.

12. Any other conditions determined by staff or the decision making body as being appropriate to the specific project.

Date Posted _____

Approved by: _____
Pete Parkinson, Director

Lead Author: Rich Holmer

Draft

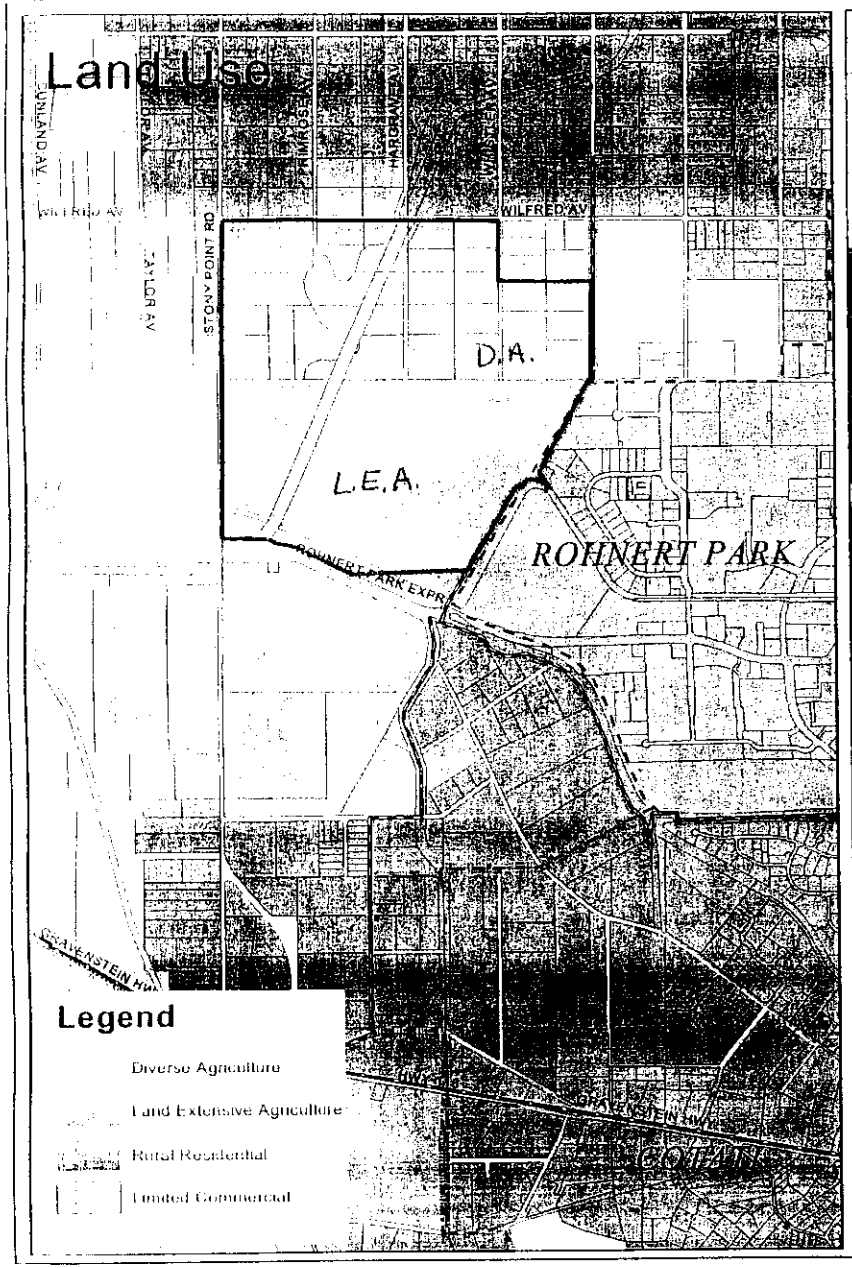
ATTACHMENT 3
COUNTY OF SONOMA
GENERAL PLAN

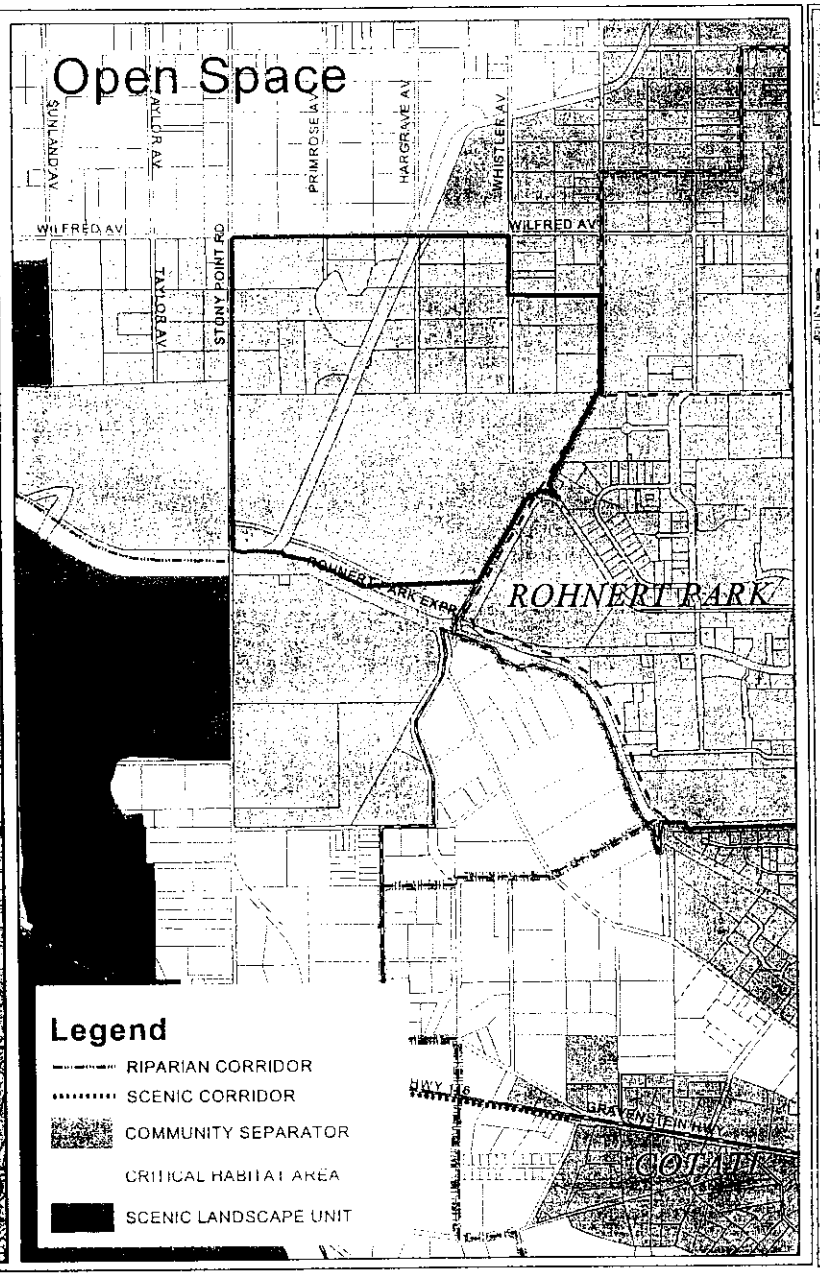
This document is available on the internet:

http://www.sonoma-county.org/prmd

Click on "General Plan Update"

Revised 03/10/04





Proposed Casino Resort Site

Legend

- Proposed Site Boundary
- Urban Service Areas
- Urban Growth Boundary
- Spheres of Influence
- City Boundaries
- Parcels

0 750 1,500 Feet

1 inch equals 1,500 feet

Permit and Resource Management Department

ATTACHMENT 3

ATTACHMENT 3

CHAPTER 7B

FLOOD DAMAGE PREVENTION

§ 7B-1 Definitions.
§ 7B-2 Lands to which chapter applies.
§ 7B-3 Basis for establishing the areas of special flood hazard.
§ 7B-4 Compliance.
§ 7B-4.5 Pre-abatement compliance investigations.
§ 7B-5 Development permit required.
§ 7B-6 Administrator.
§ 7B-7 Responsibilities of chief building official or designee.
§ 7B-8 Variance procedure.
§ 7B-9 Conditions for variances.
§ 7B-10 General standards.
§ 7B-11 Specific standards.
§ 7B-12 Floodways.
§ 7B-13 Shallow flooding.

Sec. 7B-1. Definitions.

Unless specifically defined below, words or phrases used in this chapter shall be interpreted so as to give them the meaning they have in common usage and to give this chapter its most reasonable application.

"Appeal" means a request for a review of the chief building official's interpretation of any provision of this chapter or a request for a variance.

"Area of shallow flooding" means a designated AO Zone on the Flood Insurance Rate Map (FIRM). The base flood depths range from one foot (1') to three feet (3'); a clearly defined channel does not exist; the path of flooding is unpredictable and indeterminate; and, velocity flow may be evident.

"Area of special flood hazard" means the land in the floodplain within a community subject to a one percent (1%) or greater chance of flooding in any given year.

"Base flood" means the flood having a one percent (1%) chance of being equaled or exceeded in any given year.

"Basement" means any area of the building having its floor subgrade (below ground level) on all sides.

"Breakaway walls" are any type of walls, whether solid or lattice, and whether constructed of concrete, masonry, wood, metal, plastic or any other suitable building material which is not part of the structural support of the building and which is so designed as to breakaway under abnormally high tides or wave action without damage to the structural integrity of the building on which they are used or any buildings to which they might be carried by flood waters.

"Coastal high hazard area" is the area subject to high velocity waters, including coastal and tidal inundation or tsunamis. The area is designated on a Flood Insurance Rate Map (FIRM) as Zone VE.

"Development" means any manmade change to improved or unimproved real estate, including, but not limited to, buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials, located within the area of special flood hazard.

"Existing mobilehome park or mobilehome subdivision" means a parcel (or contiguous parcels) of land divided into two (2) or more mobilehome lots for rent or sale for which the construction of facilities for servicing the lot on which the mobilehome is to be affixed (including, at a minimum, the installation of utilities, either final site grading or the pouring of concrete pads, and the construction of streets) is completed before the effective date of the ordinance codified in this chapter.

"Expansion to an existing mobilehome park or mobilehome subdivision" means the preparation of additional sites by the construction of facilities for servicing the lots on which the mobilehomes are to be affixed (including the installation of utilities, either final site grading or pouring of concrete pads, or the construction of streets).

"Flood" or "flooding" means a general and temporary condition of partial or complete inundation of normally dry land areas from:

(a) The overflow of inland or tidal waters; and/or

(b) The unusual and rapid accumulation or runoff of surface waters from any source.

"Flood Insurance Rate Map (FIRM)" means the official map on which the Federal Insurance Administration has delineated the areas of flood hazards, floodways and/or the risk premium zones applicable to the community.

"Flood Insurance Study" means the official report provided by the Federal Insurance Administration that includes flood profiles, the Flood Insurance Rate Map, and the water surface elevation of the base flood.

"Floodproofing" means any combination of structural and nonstructural additions, changes or adjustments to nonresidential structures which reduce or eliminate flood damage to real estate or improved property, water and sanitary facilities, structures and their contents.

"Floodway" means the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevations more than one foot (1').

"Historic structure" means any structure that is:

(a) Listed individually in the National Register or Historic Places (a listing maintained by the Department of Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;

(b) Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;

(c) Individually listed on a state inventory or historic places in states with historic preservation programs which have been approved by the Secretary of the Interior; or

(d) Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either:

(1) By an approved state program as determined by the Secretary of the Interior, or

(2) Directly by the Secretary of the Interior in states without approved programs.

"Lowest floor" means the lowest floor of the lowest enclosed area (including basement). An unfinished or flood resistant enclosure, usable solely for parking of vehicles, building access, or storage in an area other than a basement area is not considered a building's lowest floor; provided, that such enclosure is not built so as to render the structure in violation of the applicable nonelevation design requirements of this chapter.

"Manufactured home" means a structure that is transportable in one (1) or more sections, built on a permanent chassis, or designed to be used with or without a permanent foundation when connected to the required utilities. It does not include recreational vehicles or travel trailers.

"New construction" means, for the purpose of determining insurance rates, structures for which the start of construction commenced on or after the effective date of the ordinance codified in this chapter and includes any subsequent improvements to such structures. For floodplain management purposes, "new construction" means structures for which the start of construction commenced on or after the effective date of the ordinance codified in this chapter and includes any subsequent improvements to such structures.

"New manufactured home park or manufactured home subdivision" means a parcel (or contiguous parcels) of land divided into two (2) or more manufactured home lots for rent or sale for which the construction of facilities for servicing the lot (including at a minimum, the installation of utilities, either final site grading or the pouring of concrete pads, and the construction of streets) is completed on or after the effective date of the ordinance codified in this chapter.

"Start of construction" includes substantial improvement, and means the date the building permit was issued, provided the actual start of construction, repair, reconstruction, placement, or other improvement was within one hundred eighty (180) days of the permit date. The actual start means either the first placement of permanent construction of a structure on a site, such as the pouring of slab or footings, the installation of piles, the construction of columns, or any work beyond the stage of excavation; or the placement of a manufactured home on a foundation. Permanent construction does not include land preparation, such as clearing, grading and filling; nor does it include the installation of streets and/or walkways; nor does it include excavation for a basement, footings, piers, or foundations or the erection of temporary forms; nor does it include the installation on the property of accessory buildings, such as garages or sheds not occupied as dwelling units or not part of the main structure.

"Structure" means a walled and roofed building or mobilehome that is principally above ground.

"Substantial damage" means damage of any origin sustained by a structure whereby the cost of restoring the structure to its before-damaged condition would equal or exceed fifty percent (50%) of the market value of the structure before the damage occurred.

"Substantial improvement" means any reconstruction, rehabilitation, addition, or other improvement of a structure, the cost of which equals or exceeds forty percent (40%) for residential structures and fifty percent (50%) for nonresidential structures of the market value of the structure before the start of construction of the improvement. This term includes structures which have incurred substantial damage regardless of the value or actual cost of repair work performed. Any combination of damage repair and improvement to the structure where the cost to repair the damage and construct the improvement equals or exceeds fifty percent (50%) of the market value of the structure before the start of construction of the improvement shall be considered substantial improvement.

The term does not, however, include:

(a) Any project for improvement of a structure to correct existing violations of state or local health, sanitary or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions;

(b) Any alteration of a historic structure, provided that the alteration will not preclude the structure's continued designation as a historic structure;

(c) Construction costs necessary to comply with federally mandated requirements, including, but not limited to, requirements for handicap access for public and commercial buildings.

The value of any work excluding damage repair to be performed under a building permit issued after January 1, 1994, shall be compared to the market value of the structure at the time of permit application to calculate the percentage of the work under the permit. This percentage figure shall be added to any successive building permits that may be issued within a subsequent three (3) year period. If the combined percentage of the work performed under the building permit or permits totals forty percent (40%) or more for residential structures and fifty percent (50%) or more for nonresidential structures, this work shall constitute a substantial improvement.

"Variance" means a grant of relief from the requirements of this chapter which permits construction in a manner that would otherwise be prohibited by this chapter.

"Highest adjacent grade" means the highest natural elevation of the ground surface prior to construction next to the proposed walls of a structure.

"Mean sea level" means, for purposes of the National Flood Insurance Program, the national geodetic vertical datum (NGVD) of 1929 or other datum, to which base flood elevations shown on a communities flood insurance rate map are referenced.

"Sand dunes" means naturally occurring accumulations of sand in ridges or mounds landward of the beach. (Ord. No. 5008 § 1, 1997; Ord. No. 4887 §§ 1, 2 and 3 (part), 1995; Ord. No. 4852 §§ 2, 3, 1995; Ord. No. 4127 § 1, 1990: Ord. No. 3575 § 1, 1986.)

Sec. 7B-2. Lands to which chapter applies.

This chapter shall apply to all areas of special flood hazards within the jurisdiction of the county of Sonoma. (Ord. No. 2918 § 3.)

Sec. 7B-3. Basis for establishing the areas of special flood hazard.

The areas of special flood hazard identified by the Federal Insurance Administration in the most recent scientific and engineering report entitled "The Flood Insurance Study for the County of Sonoma," with accompanying Flood Insurance Rate Maps, is adopted by reference and declared to be a part of this chapter. The Flood Insurance Study is on file in the office of the chief building official. (Ord. No. 4887 § 4, 1995: Ord. No. 3575 § 2, 1986: Ord. No 2918 § 3.)

Sec. 7B-4. Compliance.

No structure or land shall hereafter be constructed, located, extended, converted or altered without full compliance with the terms of this chapter and other applicable regulations. (Ord. No. 2918 § 3.)

Sec. 7B-4.5. Pre-abatement compliance investigations.

Any improvements upon a parcel which, pursuant to Federal Emergency Management Agency (FEMA) records, was claimed by the owner to have been damaged, for which there is probable cause to believe reconstruction or rehabilitation was undertaken, and for which an appropriate permit authorizing reconstruction does not exist, shall be presumed to be unlawful and subject to referral for abatement proceedings. The assessed owner shall be provided with notice of the rebuttable presumption of unlawful construction and afforded thirty (30) days to contact Sonoma County permit and resource management department to schedule a hearing to ascertain the permit status of the property. Appearance at the informal hearing shall extinguish the presumption, and be superseded by the findings of a de novo administrative hearing. The permit and resource management department shall hold the informal fact-finding hearing within thirty (30) working days after a request for a hearing is made. In the event findings are made that unlawful construction has taken place, or, in the event that an affected property owner does not request a de novo fact-finding hearing, appropriate abatement proceedings shall be commenced by the code enforcement division forthwith. (Ord. No. 4887 § 5, 1995: Ord. No. 4111 § 2, 1989.)

Sec. 7B-5. Development permit required.

A development permit shall be obtained before construction or development, including improvements, additions or repairs to existing structures, begins within any area of special flood hazard established in Section 7B-3. Application for a development permit shall be made on forms furnished by the chief building official and may include, but not be limited to: plans in duplicate drawn to scale showing the nature, location, dimensions and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities; and the location of the foregoing. Specifically, the following information is required:

(1) Elevation in relation to mean sea level, of the lowest floor (including basement) of all structures;

(2) Elevation in relation to mean sea level to which any structure has been floodproofed;

(3) Certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet the floodproofing criteria in this chapter; and

(4) Description of the extent to which any water course will be altered or relocated as a result of proposed development. (Ord. No. 4127 § 2, 1990: Ord. No. 4083, 1989.)

Sec. 7B-6. Administrator.

The chief building official or designee is appointed to administer and implement this chapter by granting or denying development permit applications in accordance with its provisions. (Ord. No. 4887 § 6 (part), 1995: Ord. No. 2918 § 3.)

Sec. 7B-7. Responsibilities of chief building official or designee.

Duties of the chief building official or designee shall include:

(a) Permit Review.

(1) Review all development permits to determine that the permit requirements of this chapter have been satisfied;

(2) Review all development permits to determine if the proposed development adversely affects the flood-carrying capacity of the area of special flood hazard. For purposes of this chapter, "adversely affects" means that the cumulative effect of the proposed development when combined with all other existing and anticipated development will not increase the water surface elevation of the base flood more than one foot (1') at any point;

(3) Review all development permits to determine if all other required state and federal permits have been obtained;

(4) Review all development permits to determine if the site is reasonably safe from flooding.

(b) Use of Other Base Flood Data. When base flood elevation data has not been provided in accordance with Section 7B-3, the chief building official shall obtain, review and reasonably utilize any base flood elevation data available from a federal, state, county or other source, in order to administer this chapter.

(c) Information to be Obtained and Maintained.

(1) Obtain and record the actual elevation (in relation to mean sea level) of the lowest floor (including basement) of all new or substantially improved structures;

(2) For all new or substantially improved flood proofed structures:
(i) Verify and record the actual elevation of flood proofing (in relation to mean sea level),
(ii) Maintain the flood proofing certifications required in Section 7B-5,
(iii) Maintain for public inspection all records pertaining to the provisions of this chapter.

(d) Alteration of Watercourses. Require that maintenance is provided within any altered or relocated portion of a watercourse so that the flood-carrying capacity is not diminished. Notify adjacent communities and the California Department of Water Resources prior to such alteration or relocation of a watercourse, and submit evidence of such notification to the Federal Insurance Administration.

(e) Interpretation of FIRM Boundaries. Make interpretations where needed, as to the exact location of the boundaries of the areas of special flood hazards (for example, where there appears to be a conflict between a mapped boundary and actual field conditions). The person contesting the location of the boundary shall be given a reasonable opportunity to appeal the interpretation as hereinafter provided. (Ord. No. 4887 § 6 (part), 1995: Ord. No. 4127 § 3, 1990: Ord. No. 4083, 1989.)

Sec. 7B-8. Variance procedure.

(a) The board of building appeals as established by Section 7B-3 hereof shall hear and decide appeals and requests for variances from the requirements of this chapter.

(b) The board of building appeals shall hear and decide appeals when it is alleged there is an error in any requirement, decision, or determination made by the chief building official in the enforcement or administration of this chapter.

(c) In passing upon such applications, the board of building appeals shall consider all technical evaluations, all relevant factors, standards specified in other sections of this chapter, and:

(1) The danger that materials may be swept onto other lands to the injury of others;

(2) The danger to life and property due to flooding or erosion damage;

(3) The susceptibility of the proposed facility and its contents to flood damage and the effect of such damage on the individual owner;

(4) The safety of access to the property in times of flood for ordinary and emergency vehicles;

(5) The expected heights, velocity, duration, rate of rise, sediment transport of the flood waters and the effects of wave action, if applicable, expected at the site; and

(6) The costs of providing governmental services during and after flood conditions, including maintenance and repair of public utilities and facilities such as sewer, gas, electrical, and water systems, and streets and bridges.

(d) Generally, variances may be issued for new construction and substantial improvements to be erected on a lot of one-half (½) acre or less in size contiguous to and surrounded by lots with existing structures constructed below the base flood level, providing items (c)(1) through (6) in this section have been fully considered. As the lot size increases beyond the one-half (½) acre, the technical justification required for issuing the variance increases.

(e) Upon consideration of the factors of this section and the purposes of this chapter, the board of building appeals may attach such conditions to the granting of variances as it deems necessary to further the purposes of this chapter.

(f) The chief building official shall maintain the records of all appeal actions and report any variances to the Federal Insurance Administration upon request. (Ord. No. 2918 § 3.)

Sec. 7B-9. Conditions for variances.

(a) Variances may be issued for the reconstruction, rehabilitation or restoration of structures listed on the National Register of Historic Places or the State Inventory of Historic Places, without regard to the procedures set forth in the remainder of this section.

(b) Variances shall not be issued within any designated floodway if any increase in flood levels during the base flood discharge would result.

(c) Variances shall only be issued upon a determination that the variance is the minimum necessary, considering the flood hazard, to afford relief.

(d) Variances shall only be issued upon:

(1) A showing of good and sufficient cause;

(2) A determination that failure to grant the variance would result in exceptional hardship to the applicant; and

(3) A determination that the granting of a variance will not result in increased flood heights, additional threats to public safety, extraordinary public expense, create nuisances, cause fraud on or victimization of the public as identified in Section 7B-8, or conflict with existing local laws or ordinances.

(e) Any applicant to whom a variance is granted shall be given written notice that the structure will be permitted to be built with a lowest floor elevation below the base flood elevation and that the cost of flood insurance will be commensurate with the increased risk resulting from the reduced lowest flood elevation. (Ord. No. 2918 § 3.)

Sec. 7B-10. General standards.

In all areas of special flood hazards the following standards are required:

(a) Anchoring.

(1) All new construction and substantial improvements shall be anchored to prevent flotation, collapse or lateral movement of the structure, resulting from hydrodynamic and hydrostatic loads, including the effects of buoyancy.

(2) All mobilehomes shall be anchored to resist flotation, collapse, or lateral movement by providing over-the-top and frame ties to ground anchors. Specific requirements shall be that:

(i) Over-the-top ties be provided at each of the four (4) corners of the mobilehome, with two (2) additional ties per side at intermediate locations, with manufactured homes less than fifty feet (50') long requiring one additional tie per side;

(ii) Frame ties be provided at each corner of the home with five (5) additional ties per side at intermediate points, with manufactured homes less than fifty feet (50') long requiring four (4) additional ties per side;

(iii) All components of the anchoring system be capable of carrying a force of four thousand eight hundred (4,800) pounds; and

(iv) Any additions to the manufactured home be similarly anchored.

(b) Construction Materials and Methods.

(1) All new construction and substantial improvements shall be constructed with materials and utility equipment resistant to flood damage.

(2) All new construction and substantial improvements shall be constructed using methods and practices that minimize flood damage.

(3) All new construction and substantial improvements with fully enclosed areas below the lowest floor (including basement) that are subject to flooding shall be designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of flood waters. Designs for meeting this requirement must either be certified by a registered professional engineer or architect or meet or exceed the following minimum criteria:

(i) Either a minimum of two (2) openings having a total net area of not less than one (1) square inch for every square foot of enclosed area subject to flooding shall be provided, the bottom of all openings shall be no higher than one foot (1') above grade. Openings may be equipped with screens, louvers, valves or other coverings or devices provided that they permit the automatic entry and exit of flood waters.

(4) All new construction and substantial improvements shall be constructed with electrical, heating, ventilation, plumbing and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding.

(c) Utilities.

(1) All new and replacement water supply systems shall be designed to minimize or eliminate infiltration of flood waters into the systems;

(2) New and replacement sanitary sewage systems shall be designed to minimize or eliminate infiltration of flood waters into the systems and discharge from the systems into flood waters; and,

(3) On-site waste disposal systems shall be located to avoid impairment to them or contamination from them during flooding.

(d) Subdivision Proposals.

(1) All subdivision proposals shall be consistent with the need to minimize flood damage;

(2) All subdivision proposals shall have public utilities and facilities such as sewer, gas, electrical and water systems located and constructed to minimize flood damage;

(3) All subdivision proposals shall have adequate drainage provided to reduce exposure to flood damage; and

(4) Base flood elevation data shall be provided for subdivision proposals and other proposed development which contain at least fifty (50) lots or five (5) acres (whichever is less). (Ord. No. 4887 §§ 3 (part), 7, 1995; Ord. No. 3826, 1988.)

Sec. 7B-11. Specific standards.

In all areas of special flood hazard where base flood elevation data has been provided as set forth in Section 7B-3 or Section 7B-7, the following provisions are required:

(a) Residential Construction. New construction and substantial improvement of any residential structure shall have the lowest floor, including basement, elevated above the base flood elevation at least twelve inches (12″).

(b) Nonresidential Construction. New construction and substantial improvement of any commercial, industrial or other nonresidential structure shall either have the lowest floor, including basement, elevated at least twelve inches (12″) above base flood elevation; or together with attendant utility and sanitary facilities shall:

(1) Be floodproofed to twelve inches (12″) above the base flood elevation so that the structure is watertight with walls substantially impermeable to the passage of water;

(2) Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy;

(3) Be certified by a registered professional engineer or architect that the standards of this subsection are satisfied. Such certification shall be provided to the official as set forth in Section 7B-5.

(c) Manufactured Homes.

(1) Manufactured homes shall be anchored in accordance with Section 7B-10.

(2) New manufactured home parks and manufactured home subdivisions; expansion to existing manufactured home parks and manufactured home subdivisions; existing manufactured home parks and manufactured home subdivisions where the repair, reconstruction or improvement of the streets, utilities and pads equals or exceeds fifty percent (50%) of value of the streets, utilities and pads before the repair, reconstruction or improvements has commenced; manufactured homes not placed in a manufactured home park or manufactured home subdivision; and existing manufactured home parks or manufactured home subdivisions in which a mobile home has incurred "substantial damage" as a result of a flood, require:

(i) Stands or lots are elevated on compacted fill or on piles so that the lowest floor of the manufactured home will be at least twelve inches (12″) above the base flood elevation specified on the FIRM (Flood Insurance Rate Map);

(ii) Adequate surface drainage and access for a hauler are provided; and

(iii) In the instance of elevation on piles, that

(a) Lots are large enough to permit steps,

(b) Piles are placed in stable soil no more than ten feet (10′) apart, and

(c) Reinforcement is provided for piles extending more than six feet (6′) above the ground level.

(d) Coastal High Hazard Area.

(1) All buildings or structures shall be located landward out of reach of the mean high tide.

(2) The placement of manufactured homes shall be prohibited, except in an existing manufactured home park or manufactured home subdivision.

(3) The alteration of sand dunes which would result in an increase of potential flood damage shall be prohibited.

(4) Construction Requirements.

(i) Elevation. All buildings or structures shall be elevated so that the lowest horizontal supporting member is located no lower than the base flood elevation, with all space below the lowest horizontal supporting member open so as not to impede the flow of water, except for breakaway walls.

(ii) Structural Support.

(a) All buildings or structures shall be securely anchored on piles or columns.

(b) Piles or columns used as structural support shall be designed and anchored so as to withstand all impact forces and buoyancy factors of the base flood.

(c) There shall be no fill used for structural support.

(iii) Space Below the Lowest Floor.

(a) Any alteration, repair, reconstruction or improvement to a structure started after the enactment of the ordinance codified in this chapter shall not enclose the space below the lowest floor unless breakaway walls are used as provided for in this section.

(b) Breakaway walls may be allowed below the base flood elevation provided they are not a part of the structural support of the building and are designed so as to breakaway, under abnormally high tides or wave action, without damage to the structural integrity of the building on which they are to be used.

(c) If breakaway walls are utilized, such enclosed space shall not be used for habitation.

(iv) Certification. Compliance with the provisions of this section shall be certified to by a registered professional engineer or architect and be submitted to the chief building official. (Ord. No. 5224 § 1, 2000; Ord. No. 4887 § 8, 1995: Ord. No. 3575 § 3, 1986; Ord. No. 2918 § 3.)

Sec. 7B-12. Floodways.

Located within areas of special flood hazard established in Section 7B-3 are areas designated as floodways. Since the floodway is an extremely hazardous area due to the velocity of flood waters which carry debris, potential projectiles, and erosion potential, the following provisions apply:

(1) Prohibit encroachments, including fill, new construction, substantial improvements, and other development unless certification by a registered professional engineer or architect is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge.

(2) If paragraph (1) hereof is satisfied, all new construction and substantial improvements shall comply with all applicable flood hazard reduction provisions of this chapter.

(3) Prohibit the placement of any manufactured homes, except in an existing manufactured home park or existing manufactured home subdivision. (Ord. No. 4887 § 3 (part), 1995; Ord. No. 2918 § 3.)

Sec. 7B-13. Shallow flooding.

Located within the areas of special flood hazard established in Section 7B-3 are areas designated as shallow flooding. These areas have special flood hazards associated with base flood depths of one foot (1′) to three feet (3′) where a clearly defined channel does not exist and where the path of flooding is unpredictable and indeterminate; therefore, the following provisions apply:

(1) All new construction and substantial improvements shall be provided with adequate drainage paths around structures on slopes to guide flood waters around and away from the proposed structures;

(2) All new construction and substantial improvements of residential structures have the lowest floor, including basement, elevated above the highest adjacent grade to at least twelve inches (12″) above the depth number specified on the community's FIRM;

(3) All new construction and substantial improvements of nonresidential structures shall:

(i) Have the lowest floor, including basement, elevated above the highest adjacent grade to at least twelve inches (12″) above the depth number specified on the FIRM, or

(ii) Together with attendant utility and sanitary facilities be completely floodproofed to at least twelve inches (12″) above that level so that any space below that level is watertight with walls substantially impermeable to the passage of water and with structural components having the capability of resisting hydrostatic and hydrodynamic loads and effects of buoyancy. (Ord. No. 4887 § 9, 1995: Ord No. 3826, 1988.)

ATTACHMENT 3

Article 56.

F1 Floodway Combining District.

Sec. 26-56-005. Purpose.

Purpose: to provide land use regulations for properties situated in floodways, to safeguard against the effects of bank erosion, channel shifts, increased runoff or other threats to life and property and to implement the provisions of the general plan public safety element. The application of this district shall be based upon data from the Federal Emergency Management Agency. Additional more detailed engineering analysis of flooding, erosion or other conditions may be necessary so as to prevent property damage and safeguard the health, safety and general welfare of people. (Ord. No. 4643, 1993.)

Sec. 26-56-010. Location and boundaries.

(a) The F1 district shall be applied to properties which lie within the floodway as shown on the most recent FEMA maps and accompanying report. The boundaries of the floodway as indicated on the zoning maps should be considered approximate.

(b) The provisions of this article may be waived by the decision-making body where it is demonstrated through engineering analysis, field determinations or other appropriate data, that the precise floodway boundary differs from that shown on the FEMA maps, and provided further, that FEMA approval and sign-off is first secured. No use shall be approved within the floodway that will significantly increase the flood hazard or significantly affect the carrying or storage capacity of the floodway. (Ord. No. 4643, 1993.)

Sec. 26-56-020. Uses within floodway.

All uses allowed within the base district with which this district is combined shall be permitted subject to the provisions of Section 26-56-030, except that no new permanent structure nor structure intended for human occupancy shall be permitted within the floodway. (Ord. No. 4643, 1993.)

Sec. 26-56-030. Development standards for floodways.

The decision-making body shall be guided by the following standards in administering the FW district:

(a) The placement and type of materials used in bank stabilization shall be complementary to surrounding development and natural conditions and shall not be depreciative of surrounding property values.

(b) Where, in the opinion of the planning director or other decision-making body, topographic data, engineering studies or other studies are needed to determine the effects of bank erosion on a proposed structure or the effect of the structure, including bank stabilization activities, on the floodway and natural vegetation, the applicant may be required to submit such data.

(c) Within the Laguna de Santa Rosa, a "zero net fill" policy shall be enforced whereby no fill shall be permitted to be placed in the Laguna unless an engineering analysis demonstrates that no reduction in flood storage capacity would result from the placement of fill. For purposes of this article, the "Laguna" shall be defined as the Laguna de Santa Rosa and tributaries thereto which are within designated floodways on the most recent FEMA maps.

(d) Temporary structures such as floating docks and moorage facilities may require issuance of a use permit.

(e) Except as specifically allowed in this article, no building or structure shall be constructed, erected, moved, converted, altered or enlarged in the floodway, nor shall any other condition be allowed which would tend to cause significant stream channel alteration or adversely affect the carrying or storage capacity of a floodway, or otherwise constitute a threat to life and property. Ordinary maintenance and repair of existing nonconforming structures shall be permitted subject to the provisions of Article 94. (Ord. No. 4643, 1993.)

ATTACHMENT 3

Article 58.

F2 Floodplain Combining District.

Sec. 26-58-005. Purpose.

Purpose: to provide for the protection from hazards and damage which may result from flood waters. This district shall be combined with other districts as provided in this chapter. (Ord. No. 4643, 1993.)

Sec. 26-58-010. Location and boundaries.

The F2 district shall be applied to properties which lie within the one hundred (100) year flood hazard area as shown on the most recent FEMA maps and accompanying report. The boundaries of the one hundred (100) year floodplain as indicated on the zoning maps should be considered approximate. The provisions of this article may be waived by the decision making body where it is demonstrated through engineering analysis, field determinations or other appropriate data, that the precise one hundred (100) year floodplain boundary differs from that shown on the FEMA maps, and provided further, that FEMA approval and sign-off is first secured. (Ord. No. 4643, 1993.)

Sec. 26-58-020. Uses within floodplain.

All uses allowed within the base district with which this district is combined shall be permitted subject to the provisions of Section 26-58-030. (Ord. No. 4643, 1993.)

Sec. 26-58-030. Development standards.

The decision-making body shall be guided by the following standards, the purpose of which is to prevent the encroachment of flood waters on adjacent properties as well as preventing undue increase in flood heights and danger to life and property within this district and adjoining districts:

(a) Any structure permitted shall be constructed in accordance with the provisions of Chapter 7B of the Sonoma County Code.

(b) Where, in the opinion of the planning director, or other decision-making body, topographic data, engineering studies or other studies are needed to determine the effects of flooding on a proposed structure, or the effect of the structure on the floodway, the applicant may be required to submit such data or studies prepared by competent engineers or other technicians.

(c) In combining the F2 district with one or more other zoning districts, new residential, commercial and industrial structures will be permitted, if designed, constructed and utilized so that appreciable damage will not occur from the selected flood and provided that such structures comply with the flood protection regulations established in Chapter 7B of the Sonoma County Code. On parcels not being subdivided nor involving more than a one (1) acre development site, the Sonoma County water agency will assist applicants for building permits in locating the flood profile levels. Subdivisions will be allowed, provided

that all of the area to be subdivided is filled to the elevation of the selected flood profile level prior to platting.

(d) Within the Laguna de Santa Rosa, a "zero net fill" policy shall be enforced whereby no fill should be placed in the Laguna unless an engineering analysis demonstrates that no reduction in flood storage capacity would result from the placement of fill. For purposes of this article, the "Laguna" shall be defined as the Laguna de Santa Rosa and tributaries thereto which are designated as AE on the most recent FEMA maps. (Ord. No. 4643, 1993.)

ATTACHMENT 4

FLOOD CONTROL DESIGN CRITERIA

SONOMA COUNTY WATER AGENCY

SANTA ROSA, CALIFORNIA

SONOMA COUNTY WATER AGENCY

FILE:ZN/0-019

March 29, 1999

RE: DRAINAGE REVIEW CLARIFICATIONS

The Sonoma County Water Agency's (Agency) *"Flood Control Design Criteria"* manual was written some years ago. As a result, it tends to be out of date on a few items.

In the interest of making the design review process more efficient for both the Agency and the consultants, the following clarifications will be useful.

1. Where plastic pipe is being used, an n-value of 0.012 shall be used for design purposes.

2. The runoff coefficients shown on Plate No. B-1 *(Flood Control Design Criteria)* may not be accurate for lots under ¼-acre and ¼- to ½-acre due to the use of smaller lots with relatively large homes. It is suggested that the runoff factor "C" be calculated for developments where relatively large homes and small lots are used in lieu of using the Plate No. B-1 values.

   For vegetated areas, use the Plate No. B-1 curve for "Parks-Vegetated Areas - C_v." For other areas use a C-factor of 0.9 and follow the formula shown at the bottom of the plate to arrive at a composite C-factor for the development.

Sincerely,

Mark Lawler
Deputy Chief Engineer

rs3/u/d/thausman/clarification

P.O. Box 11628 - Santa Rosa, CA 95406 - 2150 W. College Avenue - Santa Rosa, CA 95401 - (707) 526-5370 - Fax (707) 544-6123

SONOMA COUNTY WATER AGENCY

FLOOD CONTROL DESIGN CRITERIA MANUAL

for

WATERWAYS, CHANNELS and CLOSED CONDUITS

SONOMA COUNTY WATER AGENCY
SANTA ROSA, CALIFORNIA

BOARD OF DIRECTORS

ERNIE CARPENTER CHAIRMAN
BOB ADAMS HELEN RUDEE
HELEN PUTNAM NICK ESPOSTI

November 1966
Revised April 1973
Revised August 1983

FOREWORD

The design criteria for waterways, channels and closed conduits herein contained have been adopted by the Sonoma County Water Agency for its own use in design of Agency drainage and flood control works, for the checking of design and construction of such projects which, upon completion, will be maintained by the Agency, and for checking design of private developments which are referred for review under agreement with other agencies. In the case of hydraulic review referrals performed under contract for other agencies, and if maintenance will be under their control, those agencies' structural and material standards will take precedence over this Agency's standards and this Agency's comments will be advisory only.

These design criteria have been adopted based upon experience on the part of the Agency and sampling of experiences of other like agencies throughout California. In view of the large backlog of experience represented within these standards, it is believed that adherence to the minimum requirements contained herein will provide the Sonoma County Water Agency, the County of Sonoma and cities in the County, a system of drainageways which will adequately carry off storm and drainage water.

It is important that drainage improvement projects enhance the environment. Vegetation, planted or natural, along a waterway enhances both the aesthetic and wildlife resources. As development encroaches on open space, vegetation along waterways becomes essential as refuge and nesting areas for birds and small animals. It may be advantageous not to channelize a drainageway, but to restrict development within the flood plain.

The engineer is invited to be as creative as possible and still provide a functional, safe and aesthetically pleasing waterway which is compatible with the environment.

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CHAPTER I

GENERAL

It is the general purpose of these design criteria that waters generated by storms, springs, release from reservoirs, or other sources, be carried through the system of waterways and conduits within Sonoma County in such a manner that existing or projected building sites will be free from flood hazard in all flood events up to and including a flood of magnitude which is equaled or exceeded once in one hundred years. Flood hazard is defined as potential damage by water having sufficient depth or velocity to damage improvements or to deposit or scour soil other than within channels.

Unless an individual project requires diversion of water to conform to a comprehensive drainage plan, the water shall be received and discharged at the locations which existed prior to installation of the project and as nearly as possible in the manner which existed prior to construction of the project. Should diversion be required, sufficient work shall be done upstream and/or downstream to provide affected properties at least the same level of flood protection as existed prior to the diversion.

Construction of works by separate reaches of a waterway is discussed in appropriate sections of Chapters V through VIII. Construction of an improved waterway by reaches as controlled by economic and environmental factors or the state of use of adjacent lands is often necessary. Adjoining reaches of a waterway may, in some cases, remain for a period of several years before modifications are initiated in them. In cases of construction of modified waterways

by reaches, interim construction upstream and downstream of the modified reach will generally be necessary to assure proper functioning of the modified reach and to avoid undesirable erosion or other effects in the adjacent unchanged reaches. Interim construction, insofar as possible, should be compatible with the full modifications which would ultimately be required.

This design manual is intended to provide general and some detailed design criteria. Most design details are left to the responsibility of the design engineer and may be handled by following good engineering practice. Material and construction specifications are not included, however, the Standard Specifications used by the Agency for materials and construction are listed in the references contained in the Appendix as an example of such specifications which may be utilized to good advantage in conjunction with these design criteria.

The design criteria contained herein are minimal and alternates thereto will be approved, provided such alternates are to a higher standard than those set forth herein. Exceptions to these design criteria may be allowed by the Agency when it can be determined that such exceptions are in the best interest of the public and the alternate will equal the normally accepted method.

These design criteria are intended to apply to waterways where continuous maintenance is necessary to insure adequate capacity to carry drainage and storm flows. In precipitous areas where streams have very steep gradients and are contained in ravines or canyons, the possibility of obstruction of streams to a degree which would cause flooding is generally remote. For waterways in such areas, hydraulic modification

is generally not required. In the event that modification of waterways in precipitous areas coming under the jurisdiction of the Sonoma County Water Agency is deemed necessary or advisable, design of such waterways shall have the purpose of eliminating flood hazard except for flood events occurring less frequently than once in one hundred years. Design of such waterways shall conform to good engineering practice and shall be subject to the approval of the Chief Engineer; however, some deviation from the criteria of the chapters of these design criteria on Hydraulic Design, Alignment, Sections and Bank Protection, and Structural Design may be necessary or advisable.

CHAPTER II

CLASSIFICATION OF WATERWAYS

A. General:

A waterway is defined as any natural or arti icial channel or depression in the surface of the earth which provides a course for water flowing either continuously or intermittently.

Waterways coming under the jurisdiction of these design criteria shall be classified as defined below. A waterway may be subdivided into reaches, each of which may be of a different classification; however, each reach of a waterway so subdivided shall be of a length which is reasonable for the classification designated. Bridges and short culverts for channel crossings are not considered as channel reaches. Hydraulic design of such structures is discussed in the appropriate chapter of this manual.

Waterways are also designated as being major, secondary, or minor, based on the area of the tributary watershed as discussed in Chapter III of this manual.

B. Natural Waterways:

Natural waterways which have sufficient waterway area to contain design discharge within the design limits stated in Chapter IV and which have proved to be reasonably stable, and which are endowed with significant natural beauty, may be left natural and, if left natural, are classed as natural waterways. Other natural waterways endowed with significant natural beauty which contain only slightly inadequate waterway area or which are unstable only at infrequent locations, may also be classed as natural waterways, provided that minor channel modifications are made which

render the waterway adequate and stable. Such minor channel modifications shall be of such character as to preserve substantially the natural features of the waterway, or the waterway shall be classified under Sections C, D or E hereinbelow or as a constructed natural waterway. A constructed natural waterway may be constructed as an alternate to other facilities or when the existing channel cannot be classified as a natural waterway.

Natural waterways and constructed natural waterways, as herein defined, shall be delineated by rail fence or other architecturally designed fence or marking which is permanent and is easily recognizable as delineating the right-of-way.

FIG. 2-1

NATURAL CHANNEL
BEFORE CLEARING

FIG. 2-2

NATURAL CHANNEL
AFTER CLEARING

C. Landscaped Constructed Waterways:

A landscaped waterway may be constructed from an existing waterway which cannot be classified as a Natural Waterway under Section B, but for which landscaping, planting or other aesthetic treatment may be desirable to enhance the appearance of the waterway and the livability of adjacent areas. Landscaped constructed waterways shall be designed in accordance with all provisions of these design criteria applicable to constructed open channels. Landscaping, planting, irrigation systems and other aesthetic treatment shall be designed for minimum maintenance and for minimum danger to the general public from hazards inherent in open channels. Plant materials and arrangements thereof shall be substantially in accordance with the recommendations contained in Reference 8 in the Appendix, unless otherwise approved by the Chief Engineer.

FIG. 2-3

EARTH CHANNEL
VELOCITY UNDER 6 FEET PER SECOND

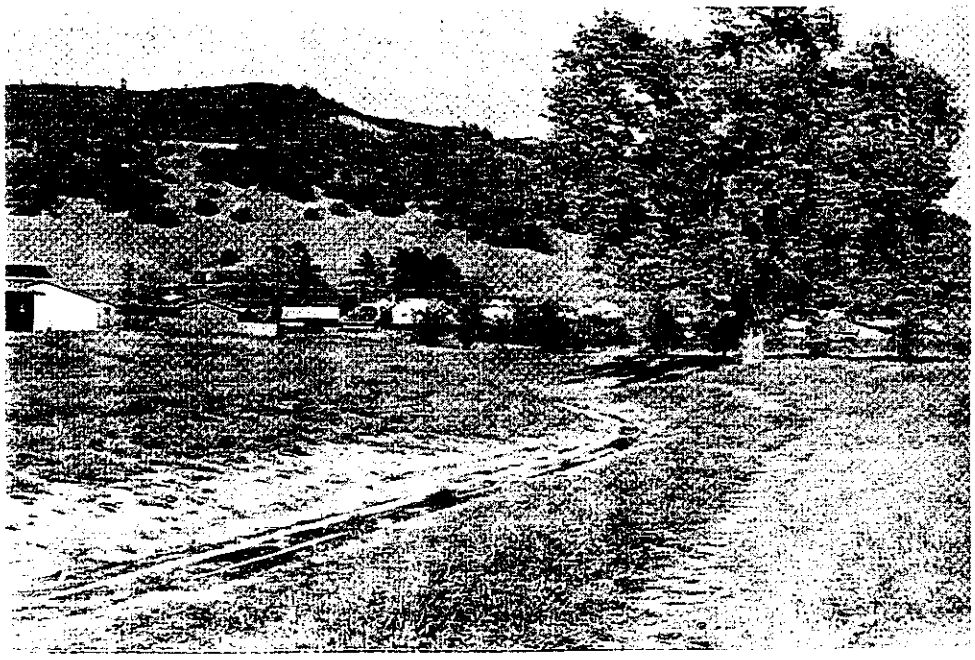


FIG. 2-4

CONSTRUCTED CHANNEL
PRIOR TO INSTALLATION OF LANDSCAPING

Landscaped constructed waterways may have right-of-way delineated as described under Natural Waterways.

D. Closed Conduits:

Waterways whose design discharge may reasonably be conveyed in a 72-inch diameter or smaller concrete pipe shall be placed underground in a closed conduit, except for natural waterways, landscaped constructed waterways, and allowable gutter or roadside ditches.

The discharge as calculated by use of the method contained in Chapter III will be used to determine whether a waterway shall be modified as a constructed channel or as a closed conduit, even though the waterway may actually be designed to convey a discharge larger than that so calculated.

E. Constructed Channels:

All waterways which cannot be classified under Sections B or D are classed as constructed channels.

CHAPTER III

HYDROLOGIC DESIGN

Hydrologic design shall be predicated upon ultimate development of the tributary watershed. Valley areas and gently to moderately sloping uplands, which are undeveloped at the time of design, shall be assumed to be fully developed as single and two family residential zones (lots under 1/4 acre in size) unless a publicly proposed development, precise zoning, or the General Plan indicates a different land use. Areas of steep terrain shall be assumed to be developed fully to an intensity of use compatible with the nature of the terrain; such use may be for residential development in lots larger than 1/2 acre, unless precise existing zoning or the General Plan indicates a different use. Steep terrain is defined as terrain whose general average slope is in excess of 20 percent. Undeveloped areas whose average ground slope is between 15 and 20 percent may be assumed as being developed into residential subdivisions with lot size of 1/4 to 1/2 acre, unless existing development, existing zoning or the General Plan indicates a different use.

Public parks, public golf courses and other publicly owned areas may be considered as vegetated to the extent that they are actually vegetated, unless publicly proposed plans show that the body having jurisdiction intends to alter the existing use of the area so as to make the surface less pervious.

Average recurrent interval is defined as the average number of years, over a long period of time, in which a given flood event is equaled or exceeded in magnitude of discharge.

Flood flows to be used for the design of waterways, channels and closed conduits shall have minimum average recurrence intervals as follows:

1. Major Waterways have a drainage area of four square miles or more and shall be designed for an average recurrence interval of 100 years.

2. Secondary Waterways have a drainage area of between one and four square miles and shall be designed for an average recurrence interval of 25 years, except as hereinafter provided.

3. Minor Waterways have a drainage area of one square mile or less and shall be designed for an average recurrence interval of 10 years, except as hereinafter provided.

A given waterway, therefore, will be classed as minor in its upper reaches, then change to the secondary classification at a point where the drainage area exceeds one square mile, and then change again to the major classification at a point where the drainage area exceeds four square miles.

Those waterways set forth in a comprehensive drainage plan of the Agency shall be designed and constructed to carry the discharge of water indicated in such a plan.

Those waterways on which stream gaging stations have been maintained for a sufficient time and for which factors are available to convert historic streamflow into streamflow based upon projected development of the watershed shall be designed to carry the flows statistically predictable.

For all other watersheds, design discharge shall be determined by the use of the rational formula:

$$Q = C\ I\ A\ K$$

in which:

Q = design discharge, cubic feet per second

C = runoff coefficient (from Plate B-1 in the Appendix, based upon ultimate development)

I = intensity of rainfall, inches per hour (from Plate B-2 in the Appendix)

A = tributary watershed area, acres

K = K factor (from Plate B-4)

Time of concentration shall be based on an initial time of 7 minutes for commercial or similar areas, 10 minutes for lots smaller than 1/2 acre, and 15 minutes for lots of 1/2 acre and larger.

Most watersheds are too large for application of the rational method in one step. In that case, the waterway shall be subdivided into reaches of reasonable length and the rational formula applied to each reach step by step, properly accumulating the parameters. The initial reach for rational method hydrology must be consistent with the initial area (not more than 2 acres) and concentration time chosen by the designer. See sample drainage computations in the Appendix.

CHAPTER IV

HYDRAULIC DESIGN

A. GENERAL:

For the solution of hydraulic design problems commonly encountered, reference may be made to the bibliography contained in the Appendix or other generally accepted references. For those uncommon design problems not susceptible to solution by reference to the bibliography, the design engineer shall provide such reference, treatise, model study report, or prototype test as is necessary to confirm his hydraulic design.

Secondary or minor waterways outletting into major or secondary downstream waterways shall be designed to operate against a 25 or 10 year flow respectively in the major or secondary downstream waterway, provided that the ground elevation along the secondary or minor system shall be above the 100 year water surface elevation in the major or secondary downstream waterway.

If a secondary or minor waterway is placed in a closed conduit, sufficient additional surface routes for flood flows shall be made available to carry the added flow increment up to the 100 year design discharge with no more than nuisance damage to improvements or projected improvements and with no inundation of present or future buildings. If such surface routes cannot be made available, the secondary or minor waterway shall be designed to carry the 100 year design discharge.

Design depth of flow in gutters shall not exceed 0.4 foot for the 10 year flow. Roadside ditches, when allowed, shall

not be used where the design flow is greater than that which could be carried in a standard gutter flowing 0.4 foot deep on the same slope as the road profile slope. Where the discharge exceeds gutter capacity, a closed conduit system shall be provided. Roadside ditches shall be designed so that the water surface for the design discharge will be at or below the outside edge of the road shoulder such that there is no flood water in the normal travel-way of the road and below adjacent ground level.

B. MANNING'S "n" VALUES:

Manning's "n" values for design shall be as follows:

1.	Concrete, steel troweled or smooth-form finish	n = .013
2.	Concrete pipe, precast or cast-in-place	n = .014
3.	Concrete, wood float or broomed finish, including pneumatically applied mortar	n = .015
4.	Asphaltic concrete	n = .017
5.	Corrugated metal pipe (non-spiral)	n = .024
6.	Sack concrete riprap	n = .030
7.	Grouted rock riprap	n = .030
8.	Loose rock riprap	n = .035
9.	Grassed channels:	
	a. For VR greater than 20	n = .035
	b. For VR less than 20	(From Reference 4)
10.	Constructed Natural Waterways	n = .050 Minimum

For natural channels, vegetated swales, or cases not covered above, "n" values shall be determined from References 4 or 12. For materials other than stated above, "n" values may be accepted

if developed and specified by the State of California and/or by an independent test performed by a reputable organization.

C. OPEN CHANNELS:

Constructed open channels and waterways shall be designed to carry the quantity of flow determined as set forth in Chapter III with minimum freeboard between design water surface and the top of bank of 1.50 feet or 0.2 of the specific energy, whichever is greater. Where this minimum freeboard does not provide the necessary differential head to allow adequate gravity drainage for projected development of the tributary areas, the design water surface shall be lowered sufficiently to allow such areas to drain to the channel by gravity, except where levees are permitted. Levees are generally unacceptable; specific exception to allow levees may be granted in tidal areas or in other situations of extreme difficulty only after a specific determination by the Chief Engineer that the proposed levee is the only feasible method of providing adequate flood protection.

For natural waterways and constructed natural waterways, design flow may be allowed in an overflow area above the defined banks provided, however, the flow must be contained within a defined overflow area and freeboard provided as specified above between the water surface and adjacent ground elevation or finished grade elevation within lots or areas in which improvements are to be constructed. Less than 1.50 feet freeboard may be considered for small natural swales and creeks through open space

such as parks and golf courses. In any event, freeboard shall be adequate to provide for reduced capacity due to weed growth and 100 year flow within the right-of-way.

Prior to computing the required freeboard, super-elevation of the water surface on curves shall be determined by use of formulas contained in Reference 1 or 2 or the formulas listed in Plate B-5 in the Appendix and the design water surface adjusted therefor. Open channels shall not be designed with a slope in the range of plus or minus 20 percent of critical slope unless added freeboard for instability waves is provided, as determined from the formula listed in Plate B-5 in the Appendix. Channels designed for supercritical flow shall have their sequent depth below top of bank.

Channels shall be designed taking into account the energy losses due to existing and projected road crossings or other obstructions to be placed within the channel. Energy losses for bridge piers, interior walls in multiple box culverts, or other obstructions within the channel, shall be predicated upon the entrance obstruction width plus 2 feet of debris allowance on each side of each obstruction. For bridge piers or multiple box culverts, in lieu of the 2 feet of debris allowance on the full height of the pier or interior walls, such piers or walls may be extended upstream on a 2 to 1 downward slope to the channel invert. A debris width of 2 feet on each side of the downward sloping wall shall be considered for the upper quarter of the bridge or culvert depth except that the minimum height

of debris shall be 2 feet. In lieu of debris allowance at small pipes and groups of small pipes, a flared entrance section or a debris trap must be used.

Bridges, culverts, and utility crossings which span major and secondary open channels and which are existing, planned or projected at the time of channel design shall have a minimum clearance from soffit to design water surface of 1.0 foot and shall cause no encroachment on the specified minimum freeboard in the upstream channel or waterway. Channels shall be designed with proper allowances for hydraulic losses for all such planned or projected future crossings to maintain clearance and freeboard as specified above. In the case that a crossing is proposed over an existing channel where the hydraulic effect of the crossing was not considered in design of the channel, minor encroachment on freeboard may be permitted provided that it can be shown that such encroachment would not adversely affect gravity drainage of adjacent tributary areas. Modification of the existing channel and special attention to the design of piers or other obstructions placed in the channel may be required to keep any encroachment on freeboard at an acceptable magnitude.

The water surface profile shall be computed and plotted through all crossing structures. Culverts of all types providing crossings of minor waterways shall be designed hydraulically in accordance with entrance criteria contained in Section D for minor waterway closed conduit systems.

Constructed natural waterways shall be excavated as required to pass the design discharge under interim and ultimate conditions of natural plant and tree growth and of other natural channel characteristics. Trees and other plants and grass shall be planted as a part of initial construction to promote and encourage ultimate natural appearance. Willows and other phreatophytes shall be planted along the low flow water line as a part of initial construction.

The ultimate constructed natural waterway shall satisfy the freeboard requirements in this Chapter. The constructed natural waterway may be utilized in any situation where right-of-way space can be provided and temporary unvegetated appearance can be tolerated prior to growth and generation of natural amenities.

The following sequence of typical conditions is presented so as to describe a typical process of developing a natural waterway following initial construction and planting described above.

First through Fourth Year: Water plants such as cattails, tules and others will normally propagate naturally in the low flow and ponded portions of the channel. This growth will be allowed to remain to the extent necessary to provide habitat for stream-oriented wildlife.

FIG. 4-1

CONSTRUCTED NATURAL WATERWAY
NEWLY CONSTRUCTED

FIG. 4-2

CONSTRUCTED NATURAL WATERWAY
POST CONSTRUCTION, PRIOR TO TREE GROWTH

Fifth to Twentieth Year: The phreatophytes will have begun to dominate and shade out cattails and water plants early in this period, causing a natural decline in that type of growth. The natural habitat will be re-established and the appearance will be enhanced by large willows and other fast-growing trees and plants. The oaks or other more permanent trees will be well established, but will not yet be a dominant feature of the waterway until the later stages of this period.

FIG. 4-3

CONSTRUCTED NATURAL WATERWAY
8 TO 10 YEARS AFTER CONSTRUCTION

Twentieth Year and Beyond: The oaks and other large natural growth will have become a dominant part of the natural channel growth, causing a decline in growth of phreatophytes. After the twentieth year, evidence of original constructed excavation of the channel to gain flood-carrying capacity will be, to a large extent, obliterated by growth, stream meanders, siltation and erosion. From this point on, continuing dynamic natural forces will mold the channel shape and appearance on an ever-changing basis.

FIG. 4-4

CONSTRUCTED NATURAL WATERWAY
15 TO 20 YEARS AFTER CONSTRUCTION

The ultimate condition of the constructed natural waterway will be a result of continued maintenance, which would preclude encroachment of structures from adjacent properties and would allow all natural forces to continue except for two necessary restraints:

1. The density of growth would be limited in the flood-carrying portion of the constructed natural waterway such that the design storm would not flow deeper than originally designated.

2. The channel portion of the constructed natural waterway would be restrained if erosive forces tended to carry the channel outside the right-of-way originally reserved.

D. CLOSED CONDUIT SYSTEMS:

Major and secondary waterways placed within a closed conduit system shall have a minimum 1 foot clearance between the design water surface and the soffit of the conduit. The design depth in circular conduits shall not exceed 0.80 of the diameter of the conduit for major and secondary waterways. Minor waterways placed in closed conduit systems may be designed for full conduit capacity and, if necessary, pressure flow. The hydraulic entrance condition at a closed conduit minor waterway shall be such that the 10 year discharge will have the specified freeboard in the upstream channel or waterway and that the 100 year discharge will be contained within the banks of the upstream waterway or within drainage easements. The entrance to the closed conduit minor waterway may be submerged provided that the above criteria are satisfied. At

inlets and non-pressure type manholes within a closed conduit system, the hydraulic gradeline shall be not less than 1 foot below the gutter or inlet surface elevation or such that free weir flow will be assured at inlets. At locations where conduits are stubbed out for future extension, the design hydraulic gradeline shall be low enough to allow proper drainage of the tributary area, with a minimum of 1.5 feet below general existing ground level. For conduits designed for supercritical flow, the energy gradeline shall not be above ground level at inlets and non-pressure type manholes.

Energy losses due to debris load caused by splitting flow at entrance to or within a closed conduit system shall be computed in the same manner as obstruction losses in open channels. In addition to normal friction losses, energy losses due to entrance and exit conditions, bends and transitions shall be computed and considered.

Velocities in conduits shall be a minimum of 2.5 feet per second to give a self cleaning action to prevent siltation.

CHAPTER V

ALIGNMENT

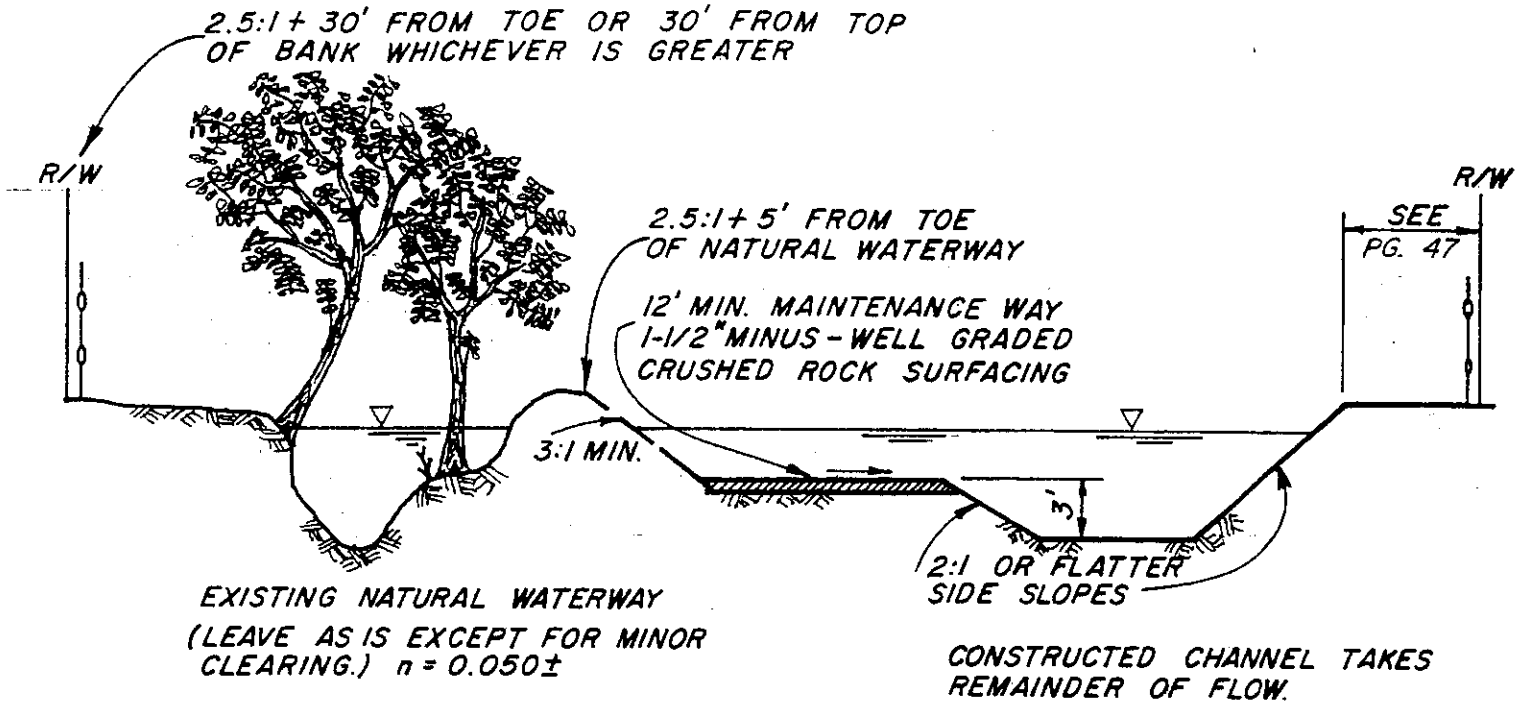
Constructed waterways generally will follow the existing waterway alignment except where bank stability, property boundary restraints or environmental factors dictate an alternative course.

Constructed waterways may be designed as a bypass facility with an alignment generally parallel to the meandering path of the existing creek. The existing waterway could carry a portion of the design flow and the bypass waterway would then carry the remainder of the design flow as shown on Pages 24 and 25.

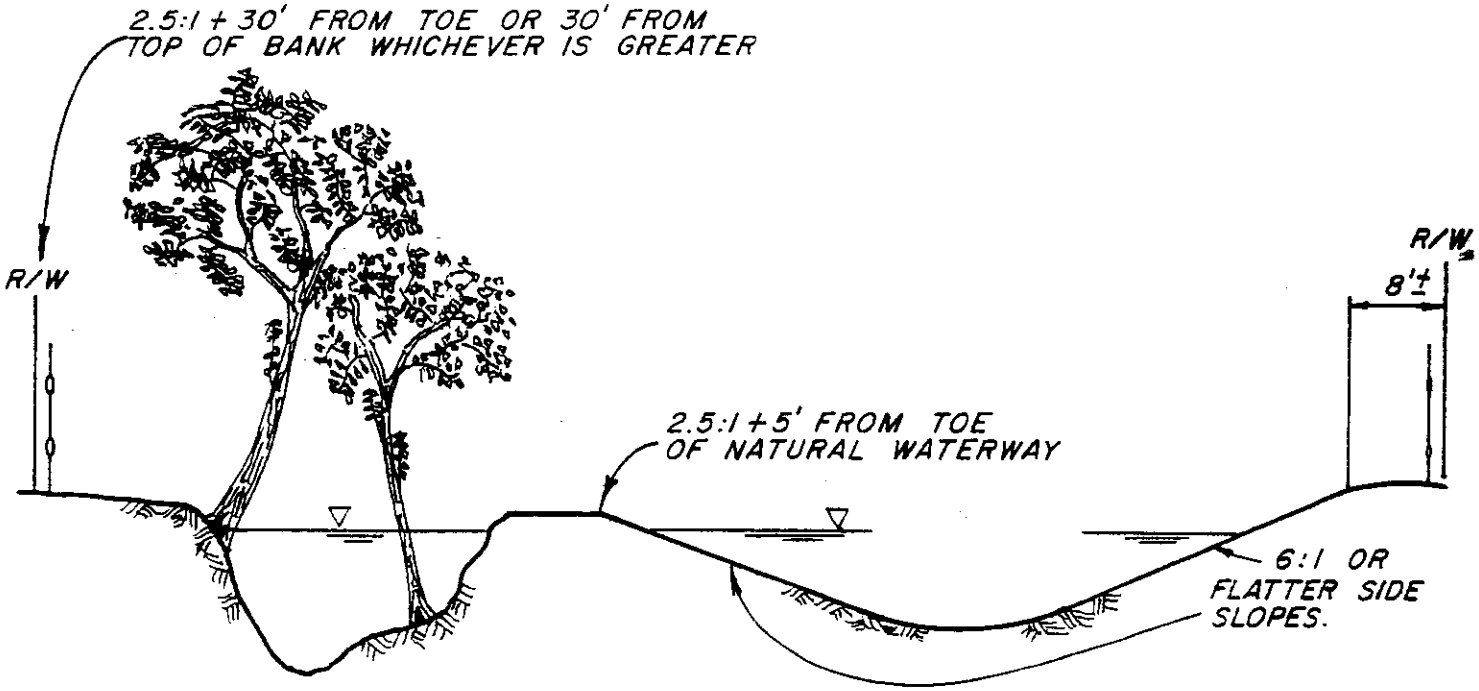
Both ends of a constructed waterway shall be aligned to conform the modified reach to the existing waterway in such a manner that the upstream and downstream waterways will not be altered by degradation, erosion or other undesirable effects.

Minimum centerline radii for curves in constructed waterways shall be three times the top width of the channel.

BYPASS SYSTEMS

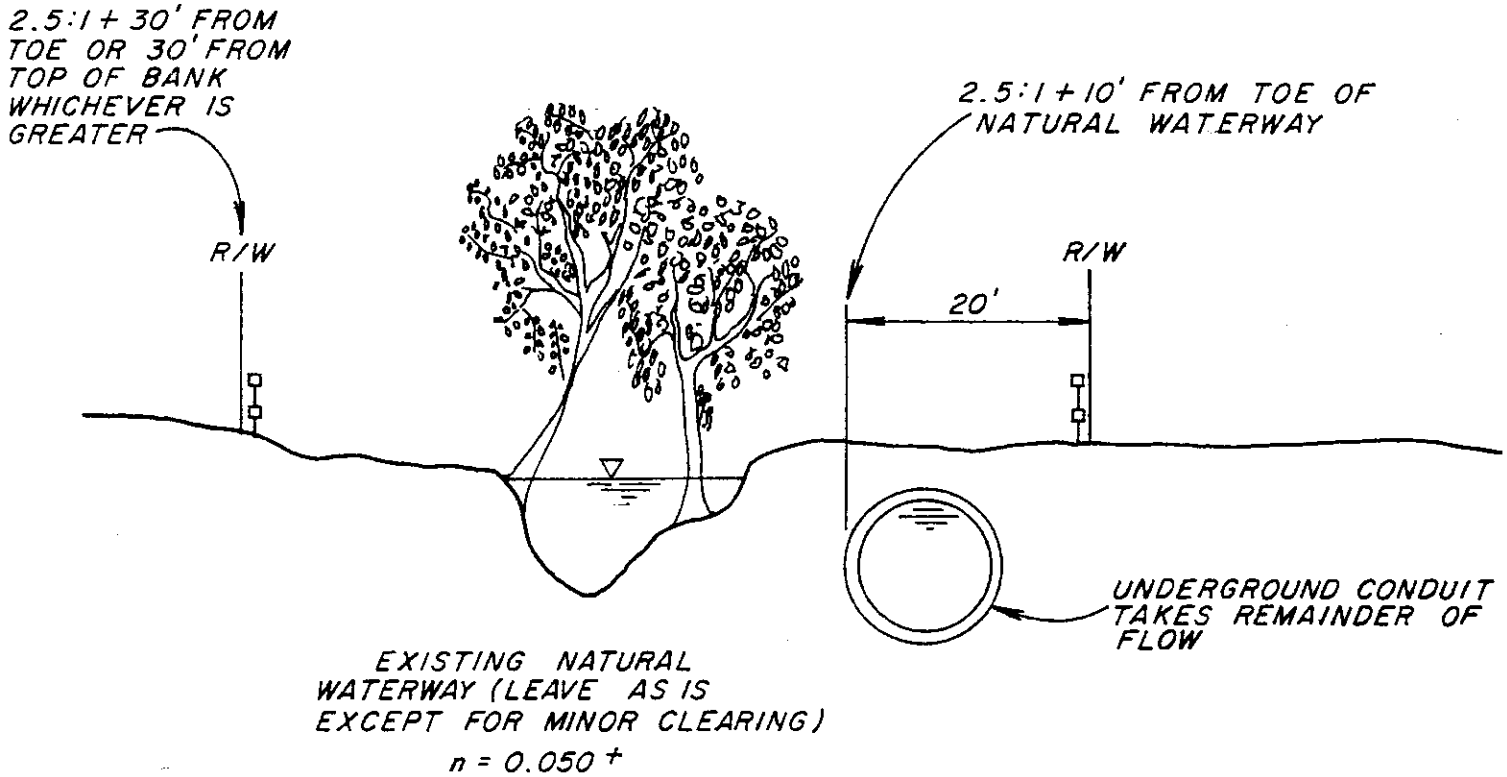


ALTERNATE 1



ALTERNATE 2

BYPASS SYSTEMS



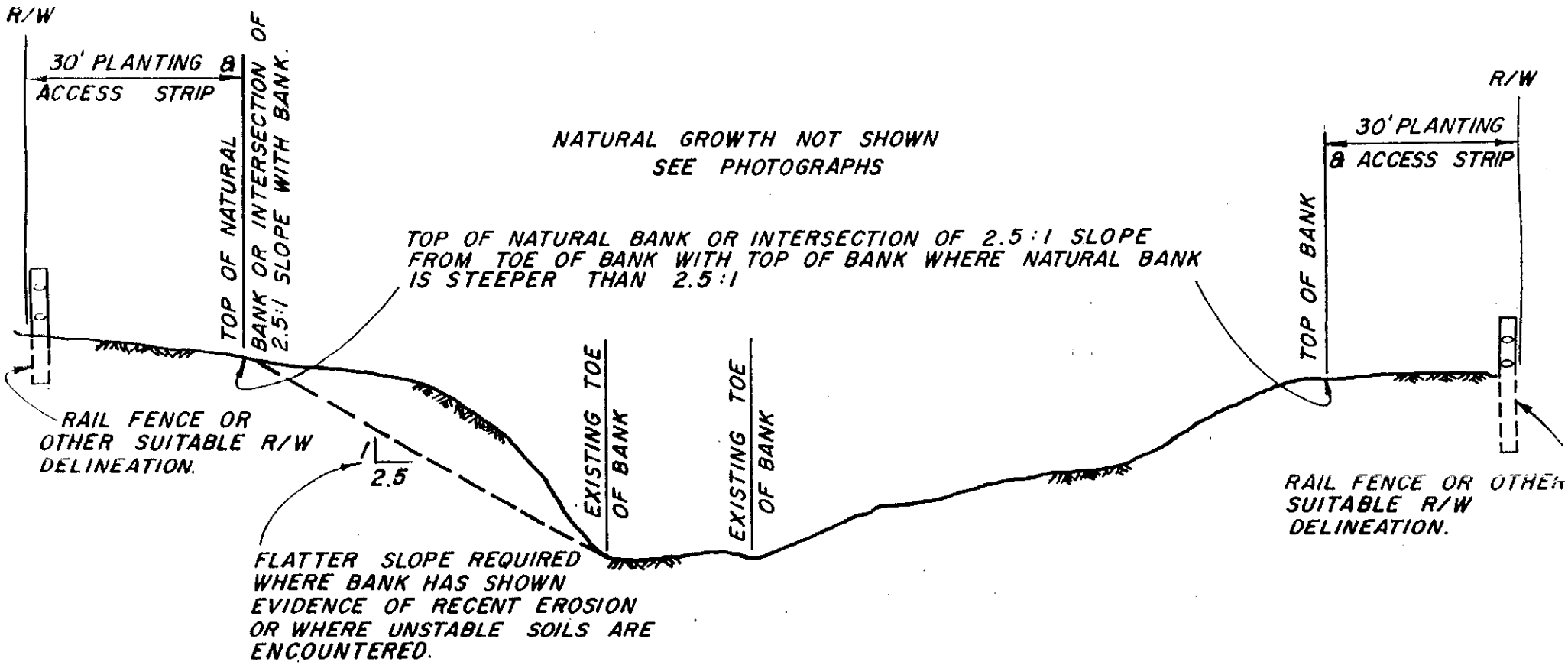
ALTERNATE 3

CHAPTER VI

SECTIONS AND BANK PROTECTION

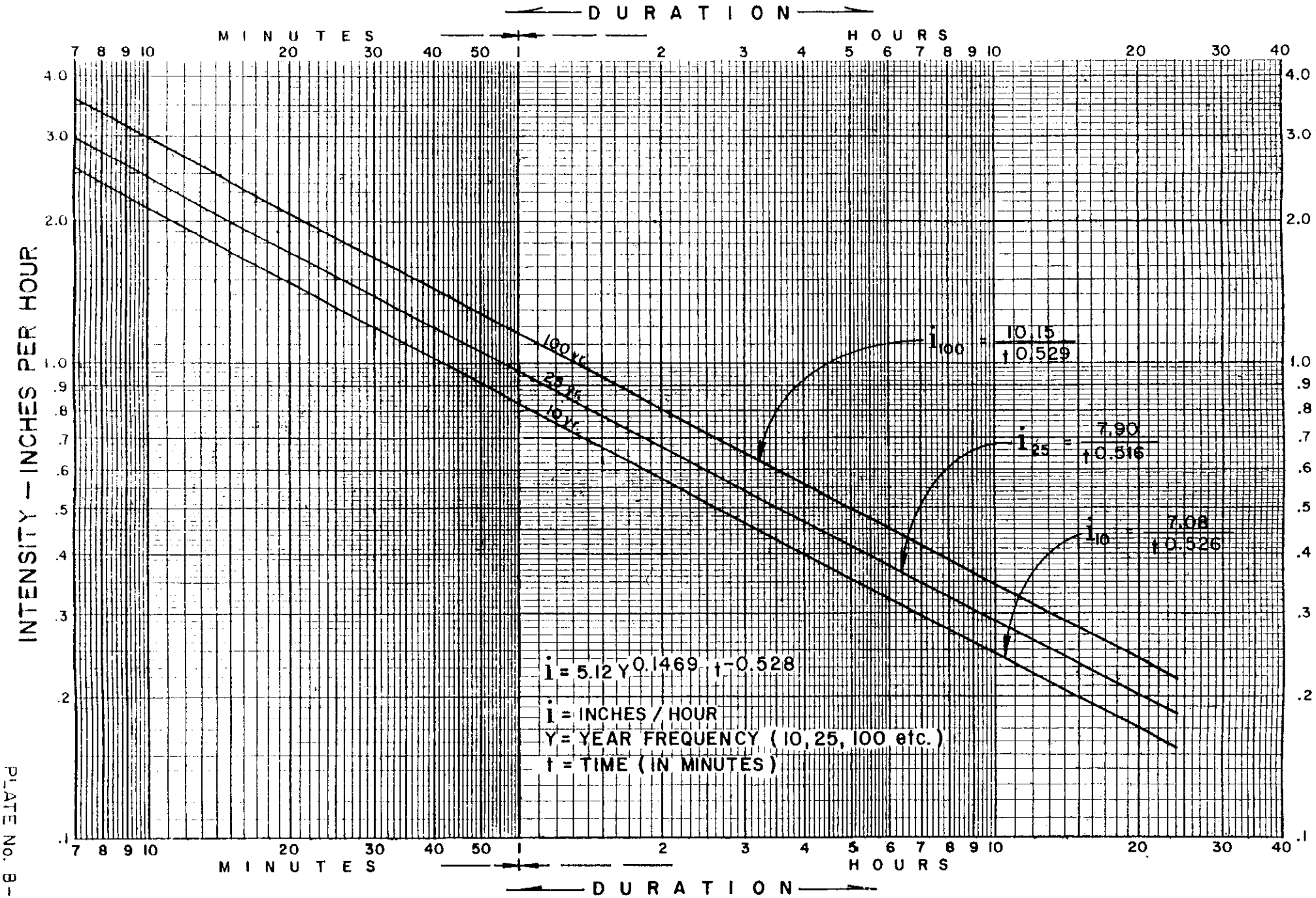
In certain reaches, the channel side slopes may need to be flattened to obtain stability in highly erosive soils or simply for aesthetic or public use value. Public use areas, such as parks or greenbelts, may be incorporated in the design of the waterway.

Bottom widths may vary as shown on Pages 27 through 32, depending on where the maintenance access is provided.



RIGHT OF WAY FOR NATURAL WATERWAY

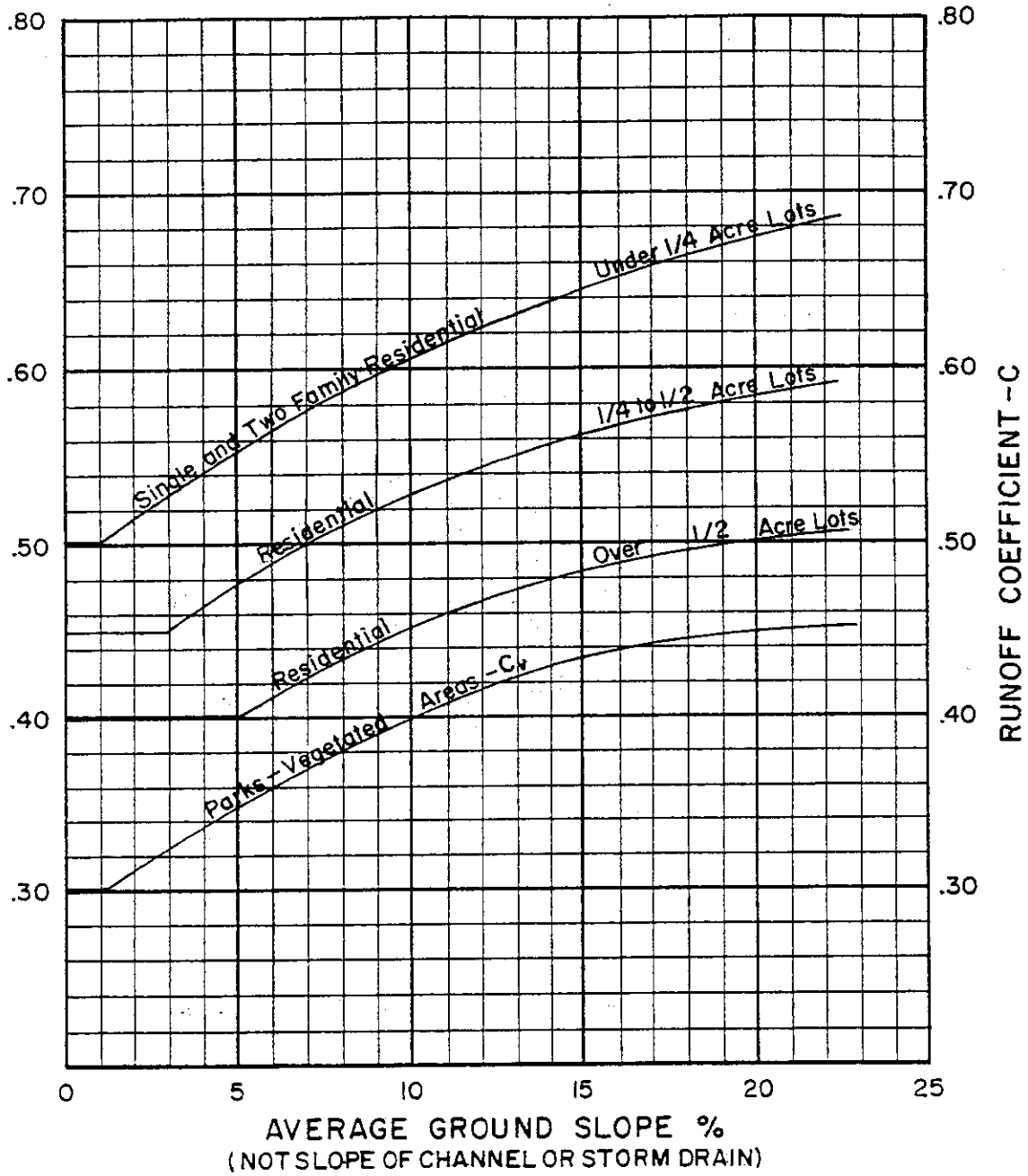
RIGHT OF WAY



NOTE: THE INFORMATION SHOWN IS SUBJECT TO ANNUAL REVISION AS ADDITIONAL RAINFALL DATA BECOMES AVAILABLE.

RAINFALL INTENSITY vs. DURATION

RUNOFF COEFFICIENTS FOR RATIONAL FORMULA



NOTE: Commercial, Industrial & Multiple Residential Areas

$C_P = 0.9$ (Based on paving, roofs, etc.)

When vegetated area exceeds 20% of total, C_V from vegetated curve may be used to reduce above C_P as follows:

$$C_T = C_V \frac{A_V}{A_T} + C_P \frac{A_P}{A_T}$$

SONOMA COUNTY WATER AGENCY

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7/64

PLATE No. B-1

REFERENCES

1. Engineering Hydraulics, Hunter House, John Wiley & Sons, 1950

2. Engineering Design Standards, Far West States, U. S. Department of Agriculture, Soil Conservation Service, 1958.

3. Open-Channel Hydraulics, Ven Te Chow, McGraw-Hill Book Company, 1959.

4. Handbook of Channel Design for Soil and Water Conservation, U.S. Department of Agriculture, Soil Conservation Service, Paper SCS-TP-61, 1947 (Stillwater Report).

5. High Velocity Flow in Open-Channels, Transactions ASCE, Vol. 116, 1951.

6. Landscape Treatment for Flood Control Channels, Sonoma County Planning Department, 1963.

7. Standard Specifications for Public Works Construction, latest edition, Northern California Chapter, American Public Works Association.

8. Planning and Design of Open-Channels, Technical Release No. 25, U. S. Department of Agriculture, Soil Conservation Service, (including Chapter 7).

9. Open Channel Flow, F. M. Henderson, Macmillan, 1969.

10. Design Manual, County of Los Angeles, Road Department

11. Criteria Manual, Urban Storm Drainage, Denver Regional Government.

12. Roughness Characteristics of Natural Channels, Harry H. Barnes, Jr., Geological Survey Water-Supply Paper 1849, U. S. Government Printing Office, Washington, 1967.

13. Handbook of Applied Hydraulics, C. V. Davis (Editor-in-Chief), McGraw-Hill Book Company, 1952.

Hiking trails may also be part of the bike paths. However, horseback riding will not be allowed on the same path as the designated bike paths or hiking trails. The horse path shall be in a separate location, preferably on the opposite side of the channel.

of 54-inches. Fourteen (14) foot long drive gates shall be provided at all locations as specified above.

Landscaped constructed waterways shall be delineated in the same manner as natural waterways.

D. RIGHTS-OF-WAY FOR CLOSED CONDUITS AND APPURTENANCES:

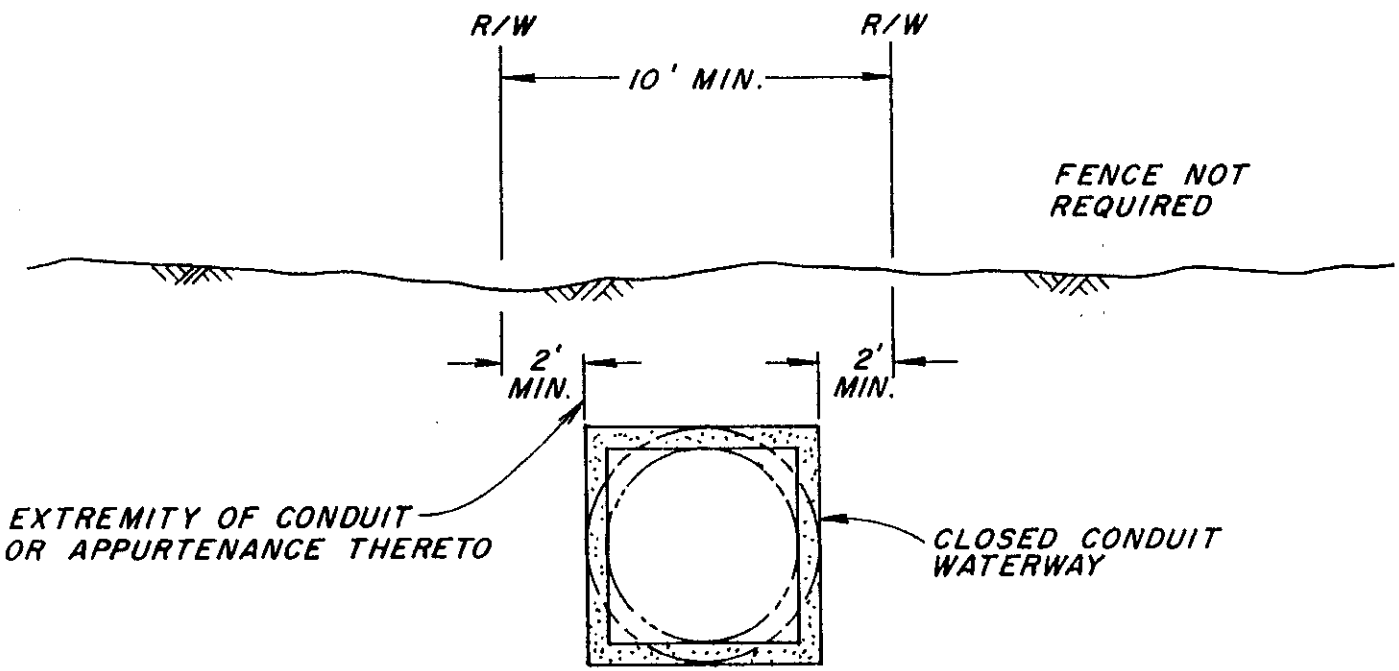
A right-of-way sufficient to contain the closed conduit system and appurtenances plus a minimum of two feet on each side thereof shall be provided but in no event shall the right-of-way be less than 10 feet in width. Insofar as possible, rights-of-way for closed conduits shall be along or adjacent to property lines and outside of areas where structures are planned. No fencing is required for closed conduit rights-of-way.

Rights-of-way for interim work shall be provided as described in Section C above.

E. RIGHTS-OF-WAY AND ACCESS FOR RECREATIONAL USE:

Waterways lend themselves very well to providing necessary land and right-of-way for the pursuit of recreational activities, such as bicycling, hiking and horseback riding. These activities as well as others shall be considered as part of the usefulness of the waterway.

Bikeways may be required along waterways that are compatible with the general bikeway plan for the area. If a waterway falls into this category, the bike pathway shall have a riding surface suitable for general bike riding. Bike paths may be incorporated as part of the maintenance way provided the surfacing will withstand the loading of the maintenance vehicles. In general, the bike path surface width shall be at least 6 feet.



RIGHT OF WAY FOR CLOSED CONDUITS

RIGHT OF WAY

additional area for planting or other landscaping. For such waterways whose side slopes are 6 to 1 or flatter, right-of-way shall equal or exceed that shown on Page 29.

Right-of-way for constructed natural waterways shall be established so as to meet the ultimate needs of such a waterway. These needs shall include ultimate roughness value, provision for erosion, natural reshaping and realignment, and access along the top of banks as shown on Page 28.

Where interim construction upstream or downstream of a project reach is required, in accordance with the provisions of Chapters I and V, all easements or rights-of-way, temporary or permanent, necessary for the performance of such work shall be acquired.

All constructed channels shall be fenced on both sides of the right-of-way as follows:

1. Within urban, suburban, and rural residential areas such fence shall be either 5 feet of chain link fabric with tension wire or 4 feet of chain link fabric and two strands of barbed wire for an overall fence height of 5 feet, or 4-foot high chain link with bar-top. Fourteen (14) foot long chain link drive gates shall be provided at all road intersections and at all other points of access to the maintenance way.
2. Within rural areas, field-type fence shall be provided consisting of 32 to 36-inch high sheeptight wire mesh with 3 strands of barbed wire for an overall fence height

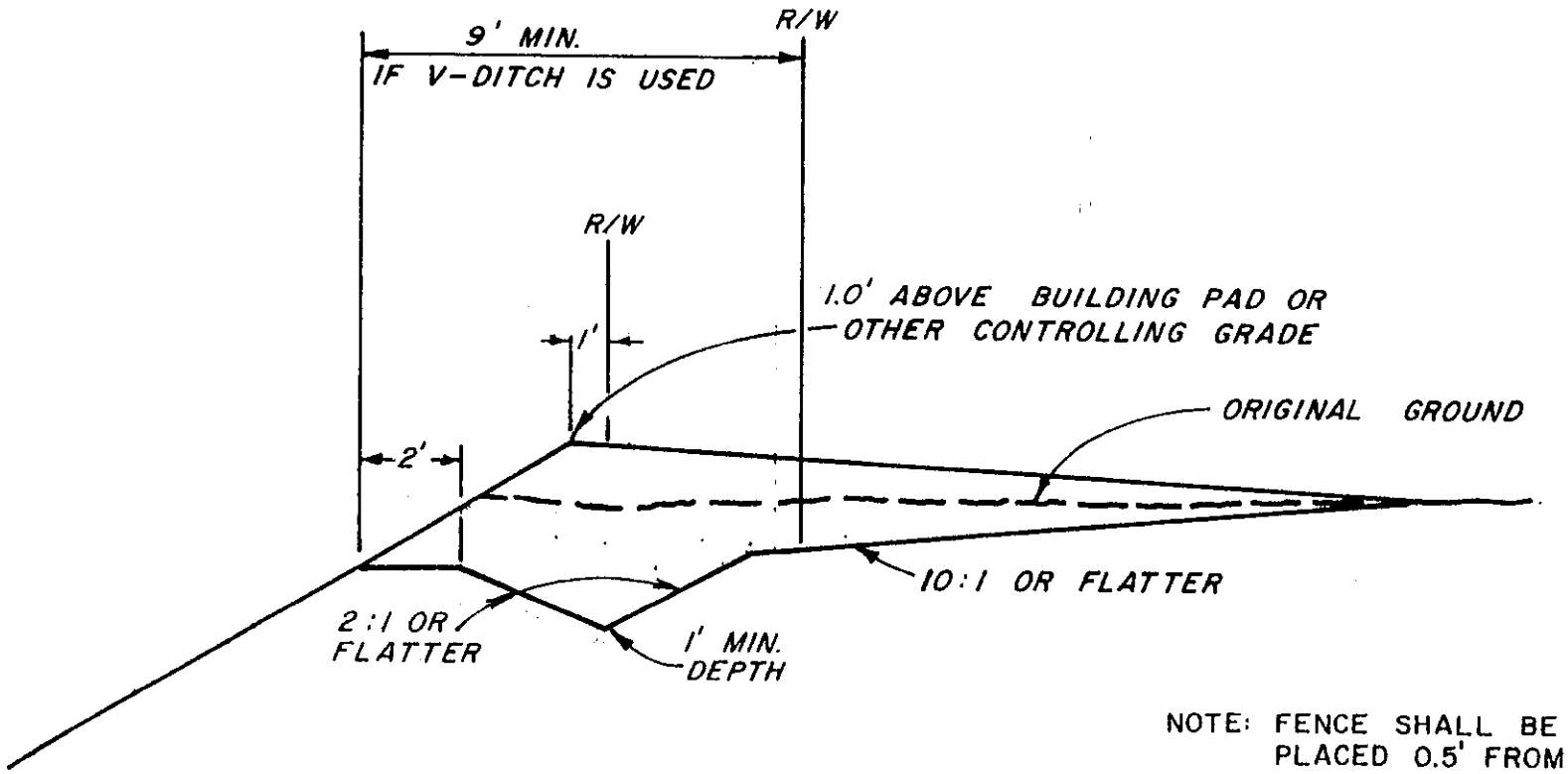
waterways with side slopes 6 to 1 or flatter shall have sufficient right-of-way provided to contain the top width of the waterway plus a minimum of 5 feet on each side.

Where ramps are not possible or access across is not allowed, such as the railroad and freeway, or where open channel tributaries are permitted to cross the maintenance way to enter the main channel, as described in Chapter V, additional right-of-way shall be provided to accommodate a minimum 40-foot radius turn-around for maintenance equipment or some other acceptable configuration.

At intersections of the channel with public roads, sufficient right-of-way shall be provided to permit access from the public road to the maintenance way. In the event that the right-of-way does not intersect a public road or projected public road, a turn-around or a 15-foot wide access right-of-way shall be provided from a public road to the channel right-of-way at intervals not to exceed one channel mile.

Right-of-way for lined channels shall extend to 0.5 foot outside the top of bank only, with a 15-foot wide access right-of-way provided to the channel from a public road at intervals along the channel of not more than 2,000 feet. Such access shall extend to channel invert by means of concrete access ramps having a maximum slope of 15 percent.

The right-of-way for landscaped constructed waterways may be the same as that designated for constructed channels or, at the option of the constructing individual or agency, right-of-way for such waterways may be increased as desired to provide



NOTE: FENCE SHALL BE PLACED 0.5' FROM R/W ON WATERWAY SIDE

ALTERNATE GRADING AT RIGHT OF WAY LINE

another top of bank is a secondary top of bank. In the case of a natural waterway having earthen bank slopes steeper than 2-1/2 horizontal to 1 vertical, the right-of-way shall be increased to provide width for not less than 2-1/2 to 1 slopes from the existing toe of bank, plus the 30 foot wide erosion buffer and access strips. Toe of bank is defined as the bottom of the slope from the top of bank excluding secondary banks. Additional right-of-way will be required where unstable ground conditions exist.

Natural waterways as defined in these standards shall be delineated as described in Chapter II, Section B, of this manual.

C. RIGHTS-OF-WAY FOR CONSTRUCTED CHANNELS, CONSTRUCTED NATURAL WATERWAYS AND LANDSCAPED CONSTRUCTED WATERWAYS AND APPURTENANCES:

Constructed channels and landscaped constructed waterways with side slopes steeper than 6 to 1 shall have sufficient right-of-way provided to contain the top width of the channel plus a minimum of 20 feet for a continuous maintenance way and interception ditch on one side, and a minimum of 9 feet on the opposite side. An alternate to the 9 feet is shown on Page 47. The 20 foot maintenance way shall be provided on both sides of channels whose top width is greater than 50 feet. The right-of-way provided shall also include any cut slopes which may be required to allow for difference in elevation between the maintenance way and natural ground, except that if the adjacent natural ground is graded down to the maintenance way on a slope of 10 to 1 or flatter, the slopes need not be included within the right-of-way. In any case, cut slopes shall not be steeper than 3 to 1. Landscaped constructed

CHAPTER VIII

RIGHT-OF-WAY REQUIREMENTS

A. GENERAL:

Land rights shall be provided in one of the following alternate forms:

1. Natural waterways, constructed channels and landscaped constructed waterways:

   a. Separate parcel easement dedicated on a subdivision map; adjacent lots shall not extend into the easement area.

   b. Fee simple, if purchased by the Agency.

   c. Fee simple or easement, if granted to Agency for no monetary consideration.

2. Closed conduits:

   a. Easement dedicated on a subdivision map as part of adjacent lots.

   b. Easement granted to Agency by purchase or for no monetary consideration.

Right-of-way requirements are shown on the drawings on pages 24, 25, 27, 28, 29, 30, 31 & 32, and are further described in Sections B, C and D below.

B. RIGHTS-OF-WAY FOR NATURAL WATERWAYS:

For natural waterways, a right-of-way shall be provided which includes the entire waterway area between the top of banks, together with a minimum 30 foot wide erosion buffer and access strip along the top of each bank. Top of bank is defined as that bank which is at or above the elevation of the adjacent natural ground outside of the waterway. A top of bank which is below

Inverted siphons will not be permitted unless necessitated by unalterable existing conditions. Closed conduits, including non-reinforced and cast-in-place concrete pipe, shall be structurally designed to withstand earth and surcharge loads normally anticipated to be imposed thereon. Clearance between top of pipe and ground shall be sufficient to preclude displacement of or damage to the conduit by all loading and surface land uses. This will generally require a minimum of 2 feet of clearance. Conduits shall be designed to have a minimum useful life of 50 years. Normally, galvanized metal conduit will not be acceptable except for outlets into open waterways, unless extra protection is provided to prolong life. In the event of erosive conditions, extra wearing surface or coating will also be required in conduits.

Closed conduits outletting into open channels or waterways shall be galvanized corrugated metal pipe for approximately the last 20 feet immediately upstream from the outlet. Such pipes shall be beveled to fit flush with the channel bank, and shall be connected to non-metal conduit by means of a concrete collar reinforced with welded wire fabric.

CHAPTER VII

STRUCTURAL DESIGN

Structural design and construction of drainage facilities shall be subject to the approval of the agency having maintenance jurisdiction. Structural design of all drainage facilities shall conform to accepted engineering practices and to the criteria set forth below.

Structures shall be designed and constructed such that hydraulic conditions in the upstream waterway will not be altered in a way which would cause degradation, erosion or other undesirable effects.

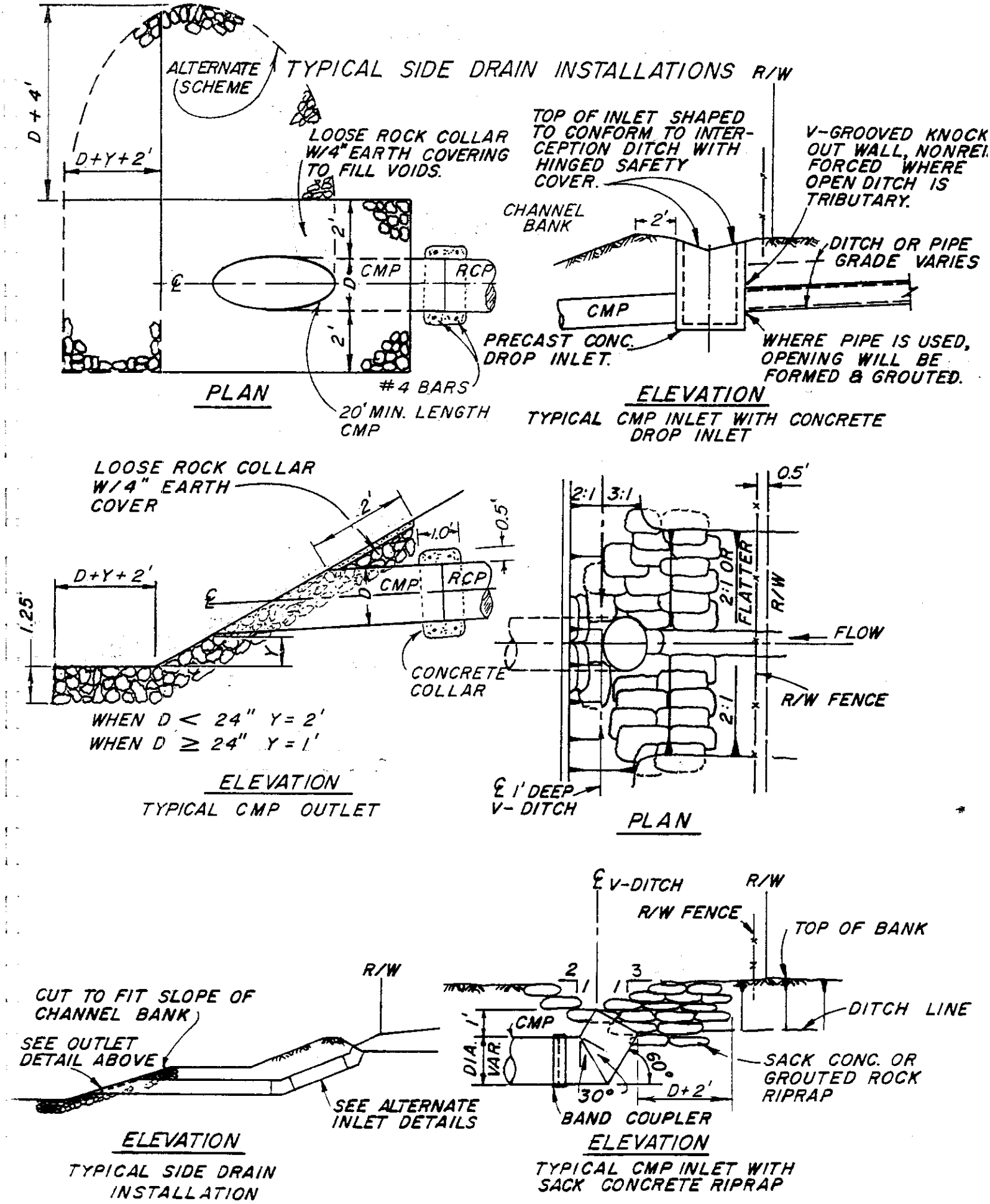
Insofar as is practicable, catch basins, manholes, inlet structures, etc., shall conform to standard plans of the agency having maintenance jurisdiction, but in any event shall be hydraulically acceptable.

Minimum dimension of conduit openings shall be 18-inches except that the minimum dimension may be 15-inches where entrance structures are provided which will prohibit debris accumulation in the conduit. Entrance structures shall be designed to allow passage of water with anticipated debris loading at entrance. The alignment of closed conduits shall be as nearly straight as practicable. Manholes or some other acceptable means of access shall be provided at or near all junctions, at all bends which are sharper than those formed by standard single bevel concrete pipe, and at intervals not to exceed 500 feet along the conduit.

may be placed in closed conduit for maintenance way crossings, or they may enter the main channel in properly designed open-channel junction structures. Major and secondary tributary waterways shall enter the main channel at an angle not exceeding 25 degrees from being parallel to flow in the main channel, and such junctions shall be designed in accordance with a momentum analysis of the flows. Where open channel tributaries cross maintenance ways, a convenient turn-around area shall be provided for maintenance vehicles. Minimum radius of a maintenance turn-around shall be 40 feet. Other acceptable configurations such as a hammerhead may be used.

Maintenance ways shall be rocked as shown on the drawings. The depressed maintenance way shall have a crushed rock surfacing 4-inches thick. The maintenance way along the bottom of the waterway shall have a crushed rock surfacing 6-inches thick. The rock shall be of sufficient quality to resist degradation under use by maintenance equipment and normal channel flows and shall have 1-1/2 inch maximum diameter and sufficient fines to produce a dense section when watered and compacted to at least 85 percent relative compaction based on California Test Method 216. The source and grading of material shall be approved by the Agency prior to placement on the service roads.

TYPICAL SIDE DRAIN INSTALLATIONS



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Bottom stabilization or protection may also be required where velocities are sufficient to cause invert erosion. Earth channels, in those areas not otherwise protected, shall be planted with an approved grass seed to establish a vegetative cover to the top of channel banks.

Drainage facilities shall be so constructed and areas adjacent to channels so graded that side drainage will enter in a manner which will prevent erosion within the rights-of-way. This will generally require constructed side inlets and collector ditches to carry side flow to the inlets. Typical side inlet structures are shown on Page 41.

Alternate designs to these side inlet structures and rock collars, such as overspills, will be considered on the basis of the cross drain being maintenance-free, allowing no obstruction to maintenance equipment and being environmentally and aesthetically acceptable. The alternate may be rejected for aesthetic reasons alone.

Side inlets shall convey the flow under maintenance ways in culverts to the main channel inverts except where an acceptable alternate is approved. Galvanized metal conduit may be used for this purpose. Where closed conduits are not required for side drainage, other facilities such as lined valley gutters shall be provided to preclude occurrence of erosion within the waterway. Tributary waterways shall be conveyed under maintenance ways in closed conduit where such flows can be conveyed in 72-inch diameter or smaller galvanized metal conduit. Larger tributary waterways

The limiting velocities shown on the typical sections apply to the usual cohesive soil conditions found in Sonoma County; lower limiting velocities may be applied to the design of channels constructed in non-cohesive soils.

For any velocity and hydraulic stress combination, the materials shown for a condition of higher velocity and stress may be used in lieu of those shown on the typical sections.

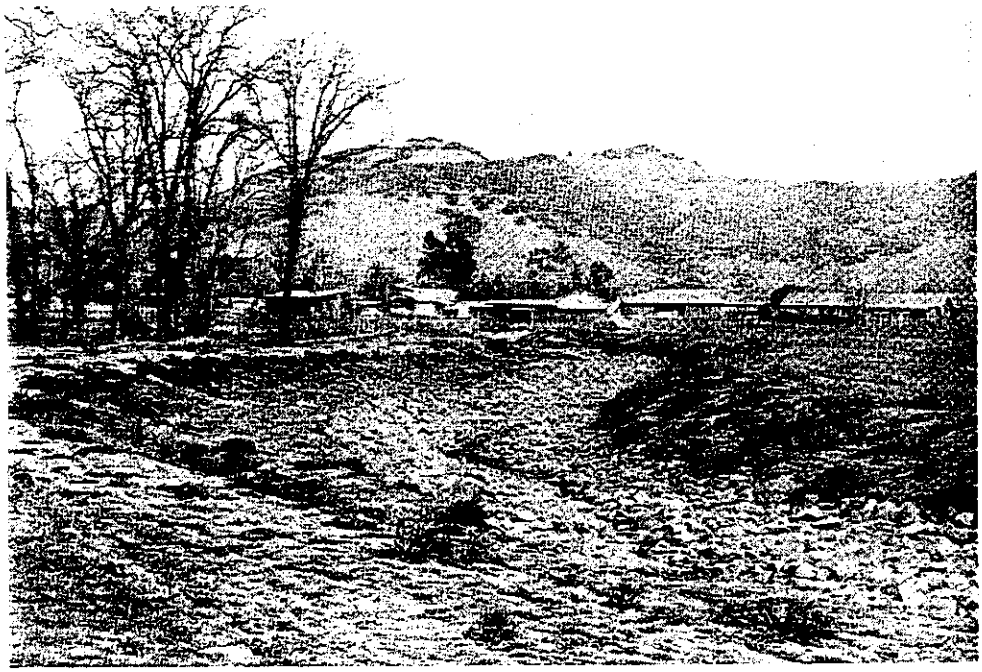


FIG. 6-4

EARTH CHANNEL
ROCK RIPRAP TO PROTECT STRESS AREAS

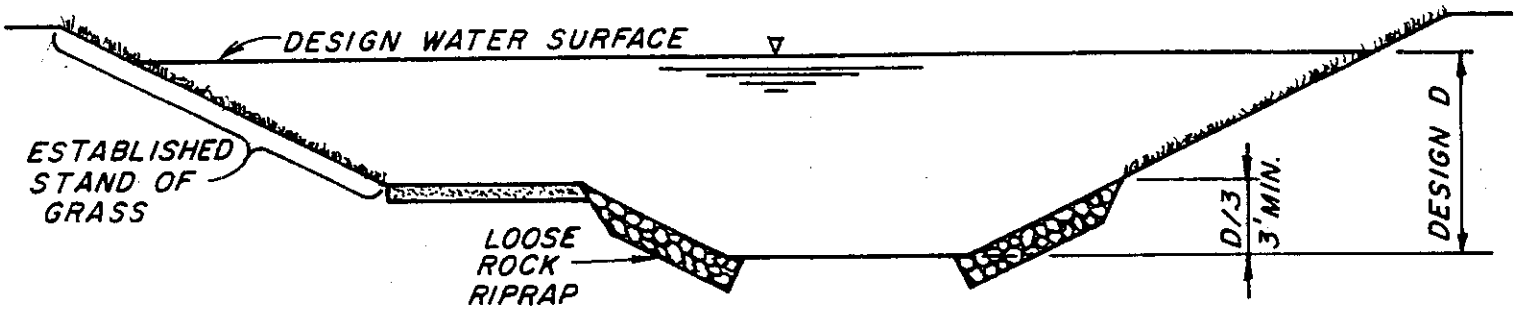
2. Loose rock riprap. Rocks shall be angular and well-graded from an average diameter of 4 inches to an average diameter of 15 inches with approximately 50 percent by weight smaller than 9 inches in average diameter. Not more than 10 percent of the rock riprap by weight shall be less than 4 inches average diameter. An occasional rock having an average diameter of not more than 20 inches may be included, provided that not more than 5 percent of the rock riprap area shall have these larger rocks projecting above the neatlines, but in any event the total rock mass shall be dense and well integrated. (See Figure 6-3)

FIG. 6-3

EARTH CHANNEL
ROCK RIPRAP TO PROTECT TOE OF SLOPE

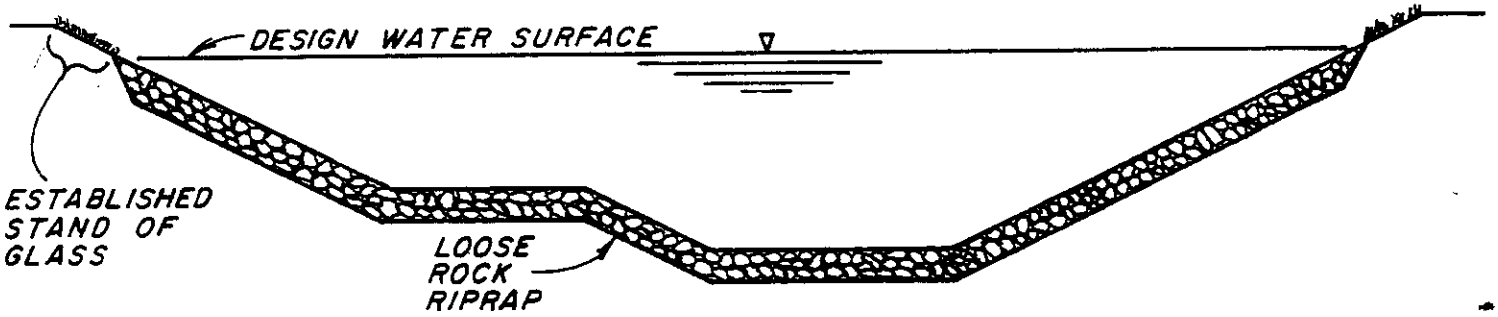
CHANNEL PROTECTION

FOR ALL CHANNELS EXCEPT NATURAL CREEKS
AND CONSTRUCTED NATURAL CHANNELS



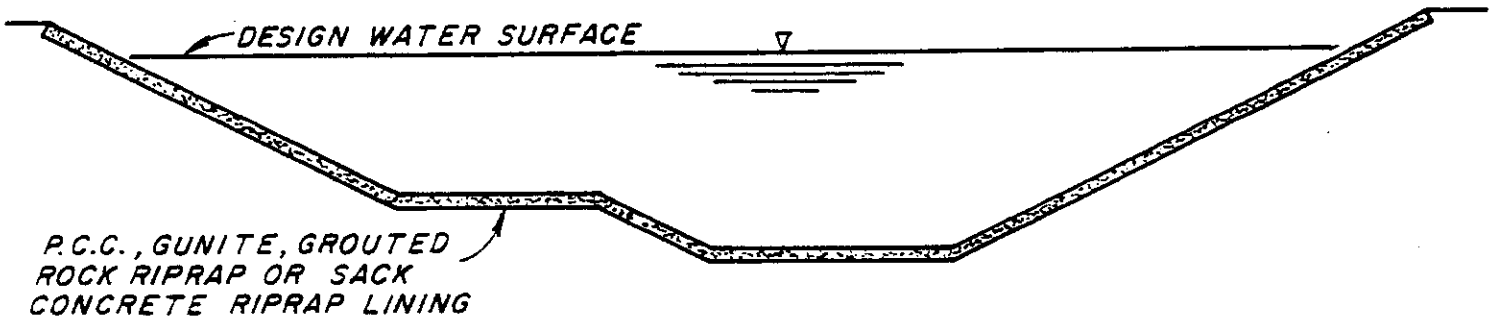
VELOCITY FROM 6 ft./sec. TO 10 ft./sec.

NON-STRESS AREAS



VELOCITY FROM 6 ft./sec. TO 10 ft./sec.

STRESS AREAS

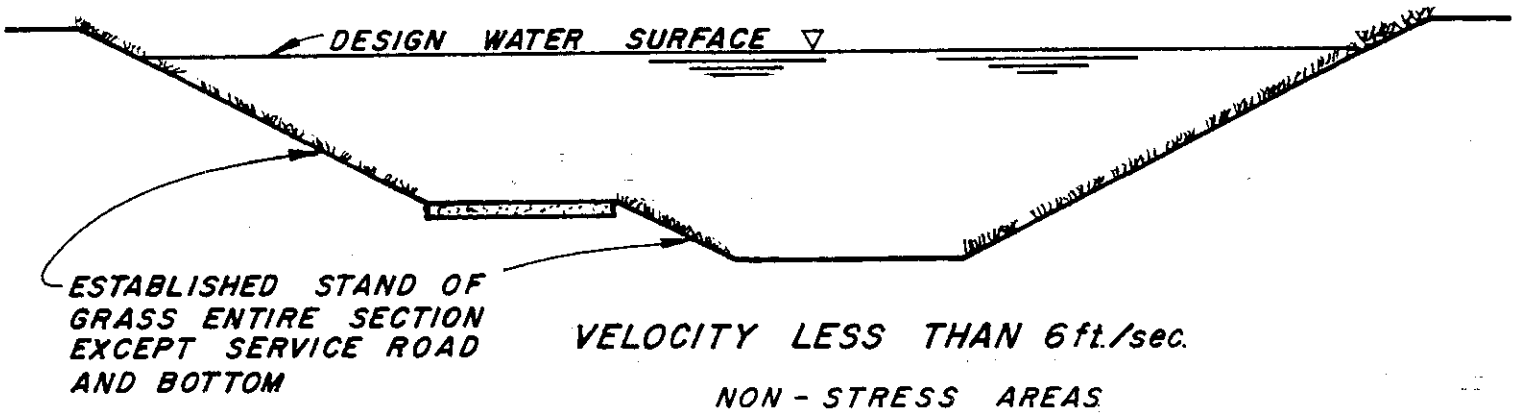


VELOCITY GREATER THAN 10 ft./sec.

ALL AREAS

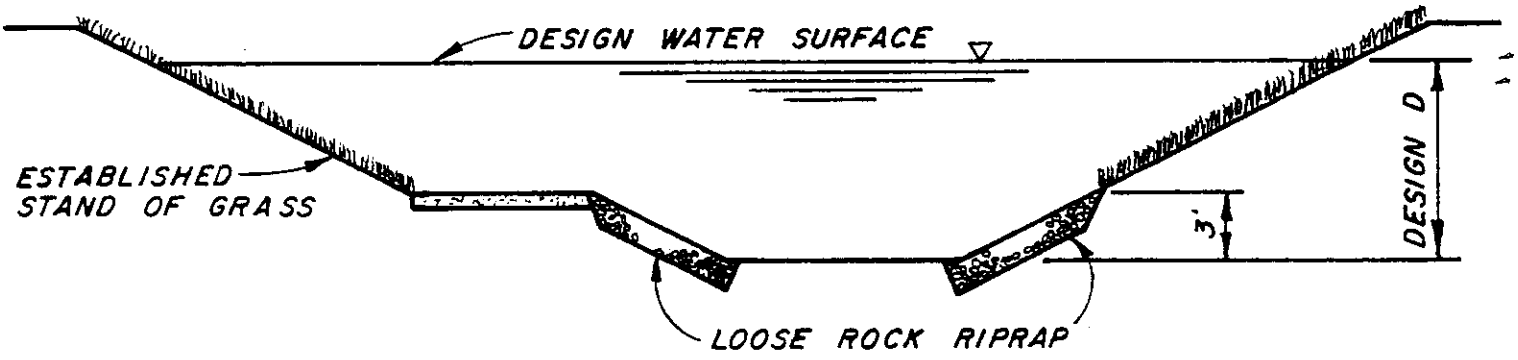
CHANNEL PROTECTION

FOR ALL CHANNELS EXCEPT NATURAL CREEKS
AND CONSTRUCTED NATURAL CHANNELS



VELOCITY LESS THAN 6 ft./sec.

NON - STRESS AREAS



VELOCITY FROM 3ft./sec. TO 6 ft./sec.

STRESS AREAS

Bank protection shall be provided in constructed channels and landscaped constructed waterways in accordance with the criteria shown on the drawings of typical sections on pages 29, 32, 36 and 37. Velocities referred to on the typical sections are, in each case, the mean velocity in the cross-section. The term "stress areas" as used on said typical sections means locations where the hydraulic stress is greater than in a straight, uniform channel reach, and includes junctions, transitions, and curves whose centerline radii are less than six times the width of the design water surface. Stress area protection shall extend downstream from the end of the stress area a distance equal to ten times the design water depth.

At drop structures or in other locations where a hydraulic jump may be formed, bank protection shall be provided downstream from the jump for a minimum distance of six times the sequent depth. This protection shall cover the channel invert and extend to the height of the sequent depth and may be either concrete, grouted rock riprap, sack concrete riprap, or air-blown mortar. A minimum distance of three times the design water depth shall be provided with loose rock riprap immediately downstream from the lined reach covering the same cross-section as required for the lining.

Any of the channel lining materials may be used for bank protection. Other acceptable materials for bank protection include the following:

1. Low-growing grass which will stay green under natural conditions in Sonoma County throughout the summer, and which will form a thick, dense turf.

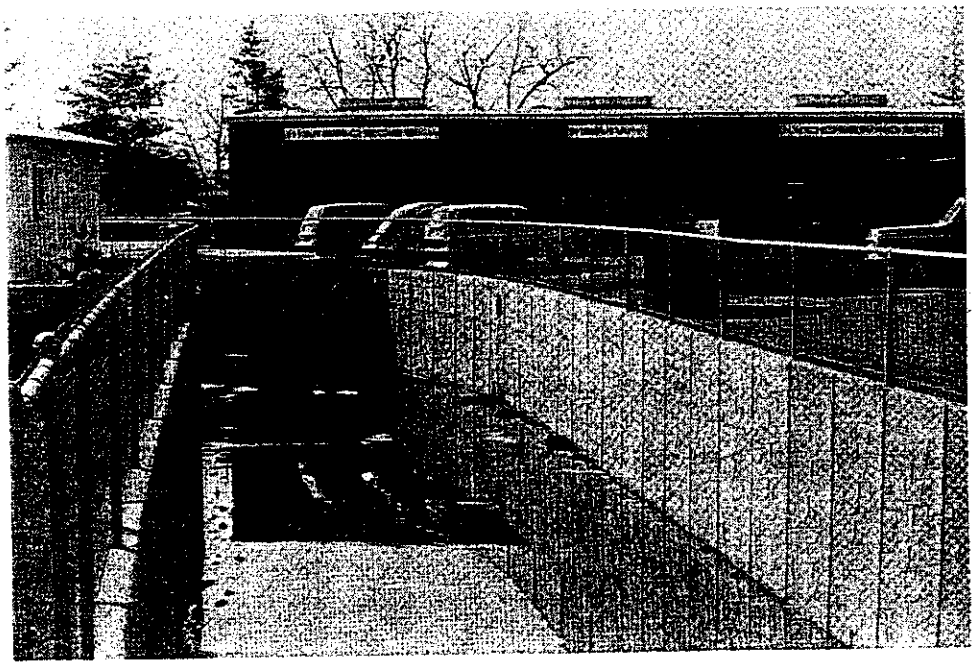


FIG. 6-2

CONCRETE CHANNEL
VERTICAL SIDES

Channels shall have flatter side slopes if soil instability appears probable from field investigation. Design of slopes in unstable soils shall be predicated upon results of an investigation by a registered professional engineer qualified in soils engineering. The depth of constructed channels and waterways shall be sufficient to allow tributary closed conduits and other tributary waterways to properly outlet into the channel. Generally this will require a minimum channel depth of 5 feet.

Side slopes may need to be protected with lining if the velocities are erosive. When concrete is used and the velocity in the concrete section is 6 feet per second or more, loose rock riprap shall be used as a transition strip above the concrete lining. If velocities dictate the necessity of channel lining, it shall consist of concrete, grouted rock riprap, Gabion type riprap, sack concrete riprap, or air-blown mortar. Grassed channels or loose rock riprapped channels shall have side slopes not steeper than 2 to 1. Lined channels shall have side slopes not steeper than 1.5 to 1 unless designed structurally to resist all lateral loads applied to the bank lining.

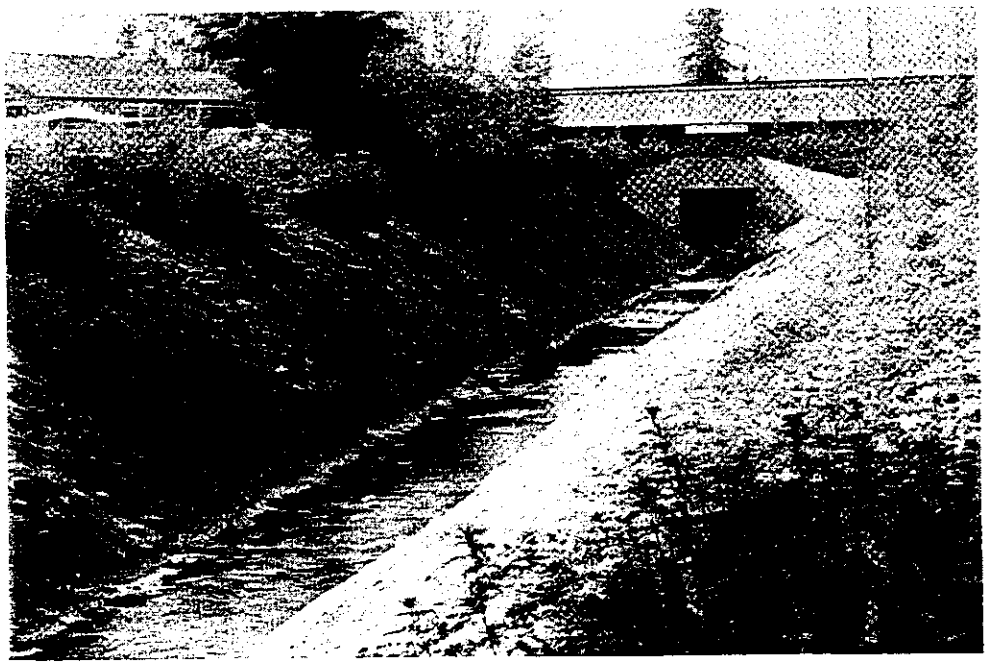
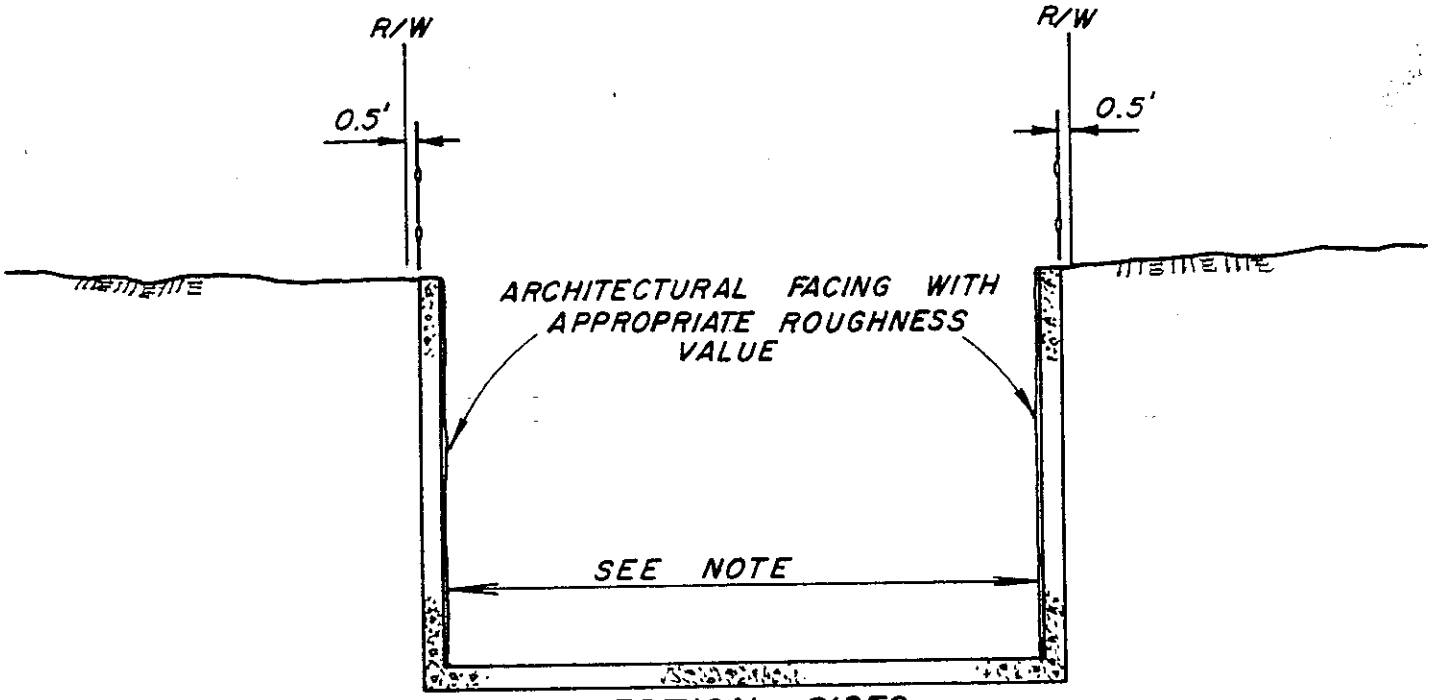


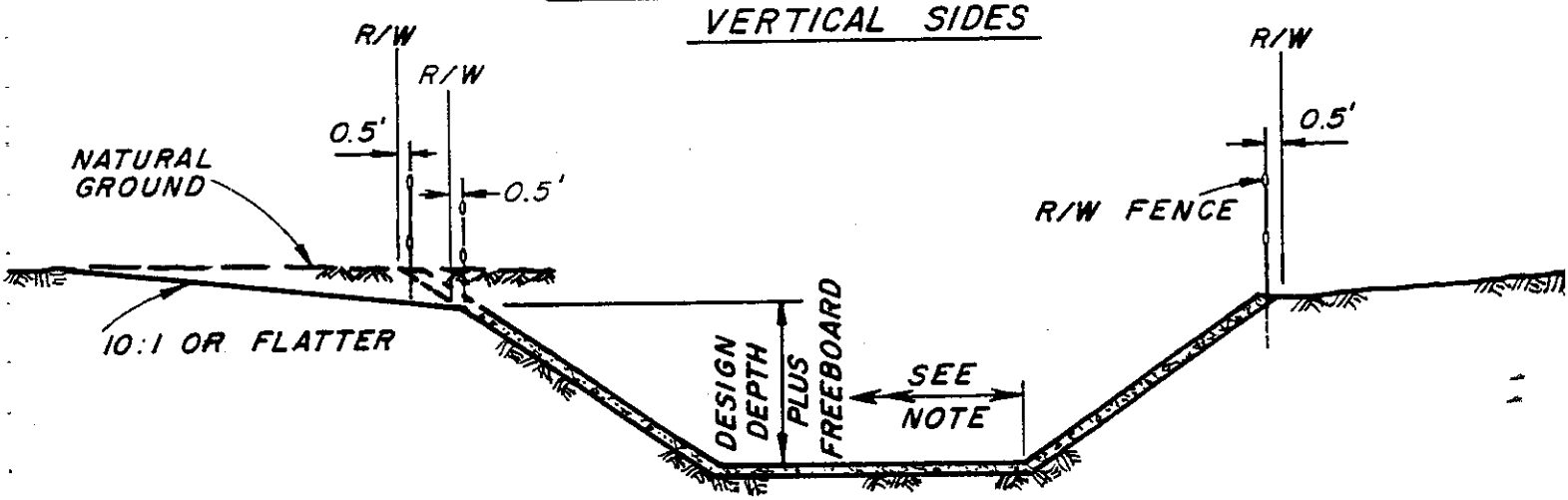
FIG. 6-1

CONCRETE CHANNEL
SLOPING SIDES

CHANNEL PROTECTION



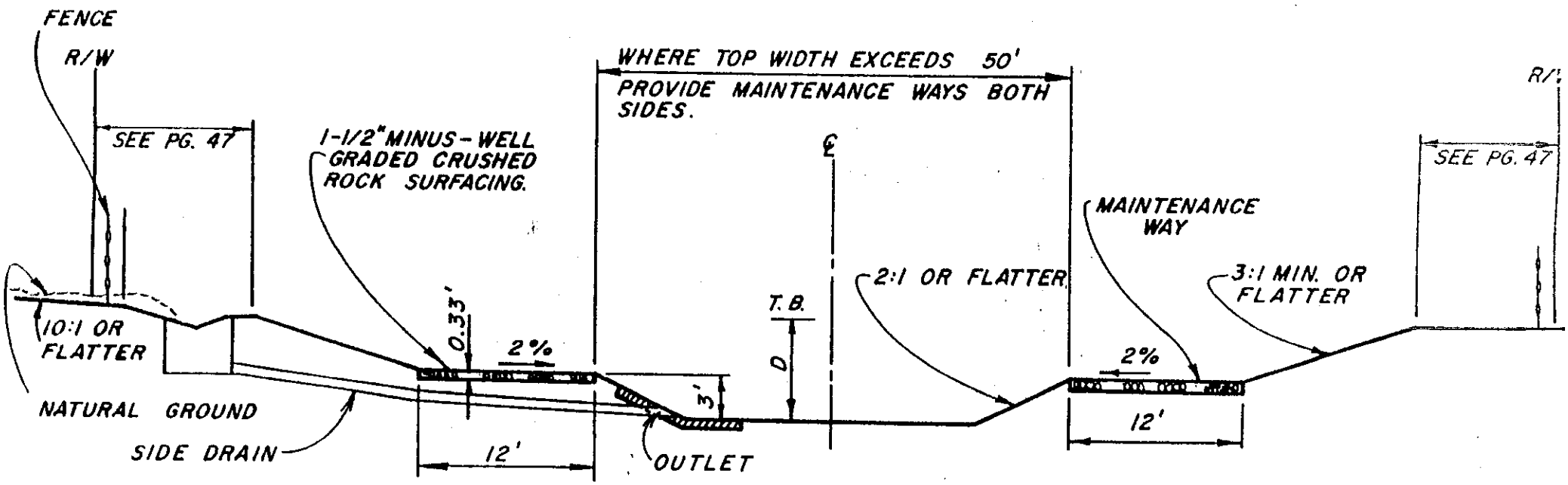
VERTICAL SIDES



SLOPING SIDES

PROVIDE ACCESS FROM PUBLIC ROAD TO CHANNEL INVERT AT INTERVALS NOT TO EXCEED 2000'

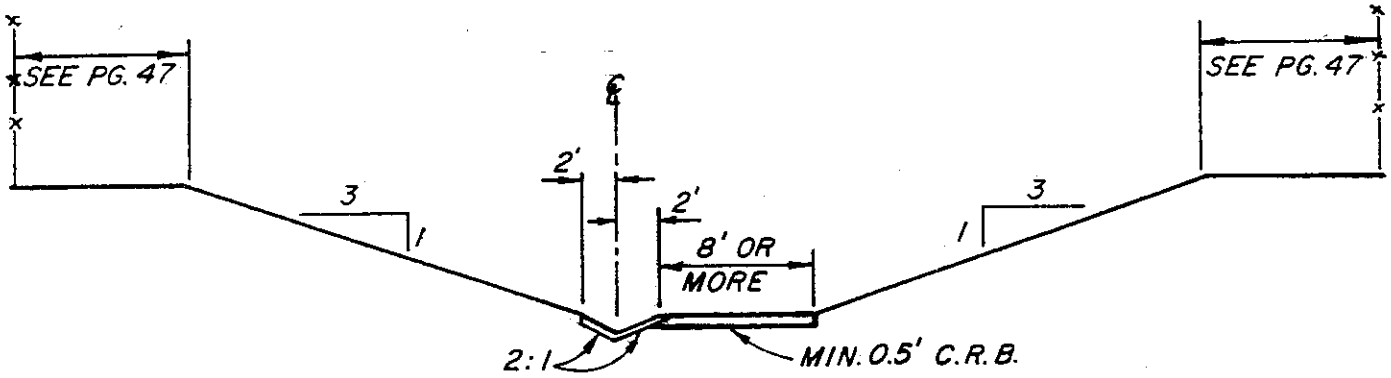
NOTE: BOTTOM WIDTH SHALL BE A MINIMUM WIDTH OF 10 FEET OR TOP OF BANK ACCESS SHALL BE PROVIDED.

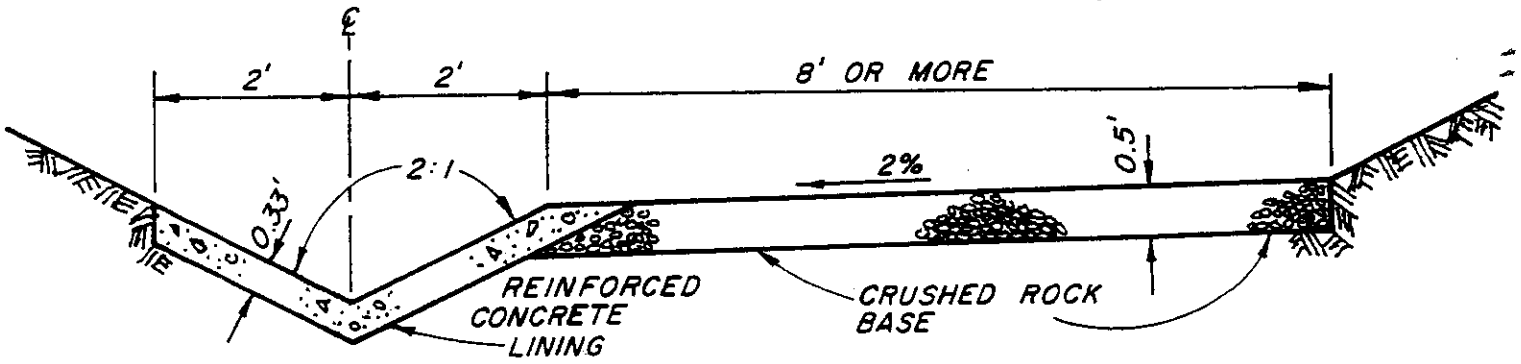


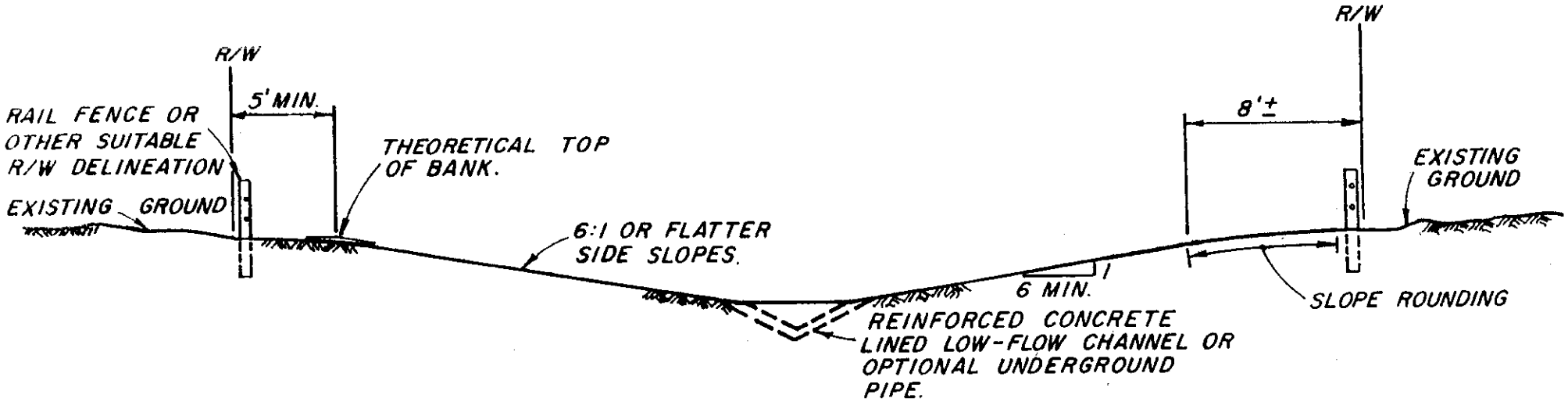
MINIMUM RIGHT OF WAY
FOR CONSTRUCTED WATERWAYS
50' TOP WIDTH OR WIDER

MINIMUM RIGHT OF WAY FOR CONSTRUCTED WATERWAYS

MINIMUM CHANNEL ALTERNATE





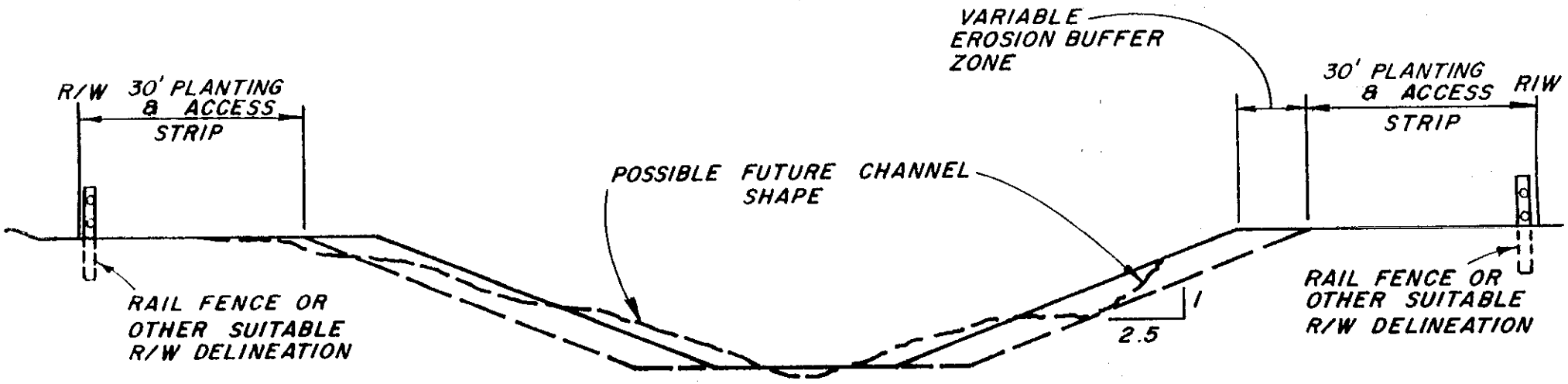


FOR MAINTENANCE WAY, PROVIDE A 12' WIDE STRIP FREE OF TREES & SHRUBS ON A 6:1 OR FLATTER SLOPE.
THE MAINTENANCE WAY MAY BE LOCATED ANYWHERE WITHIN THE R/W ON 6:1 OR FLATTER SLOPE.

PLANTING: PLANT MATERIALS AND ARRANGEMENT SHALL GENERALLY FOLLOW THE GUIDELINES CONTAINED IN REFERENCE 6, AND AS A MINIMUM SHALL COVER THE AREA FROM THE DESIGN WATER SURFACE TO THE RIGHT OF WAY (R/W) LINES, EXCEPT FOR THE REQUIRED MAINTENANCE WAY.
EARTH PORTIONS NOT CONTAINING TREES OR SHRUBS SHALL BE TURFED.

LANDSCAPED CONSTRUCTED WATERWAYS

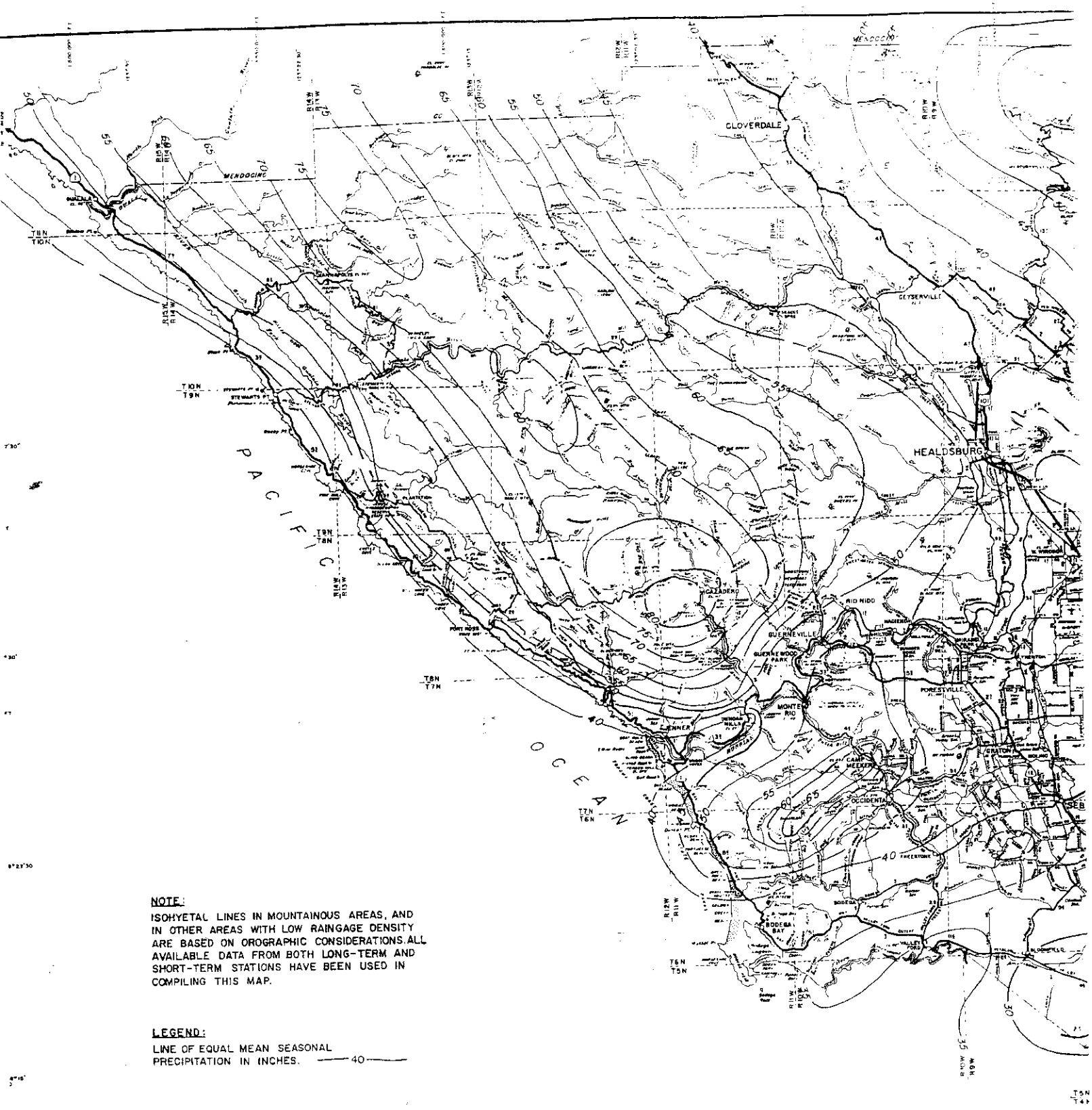
VELOCITY LESS THAN 6 ft/sec



RIGHT OF WAY FOR CONSTRUCTED NATURAL WATERWAY

VELOCITY LESS THAN 6 ft/sec

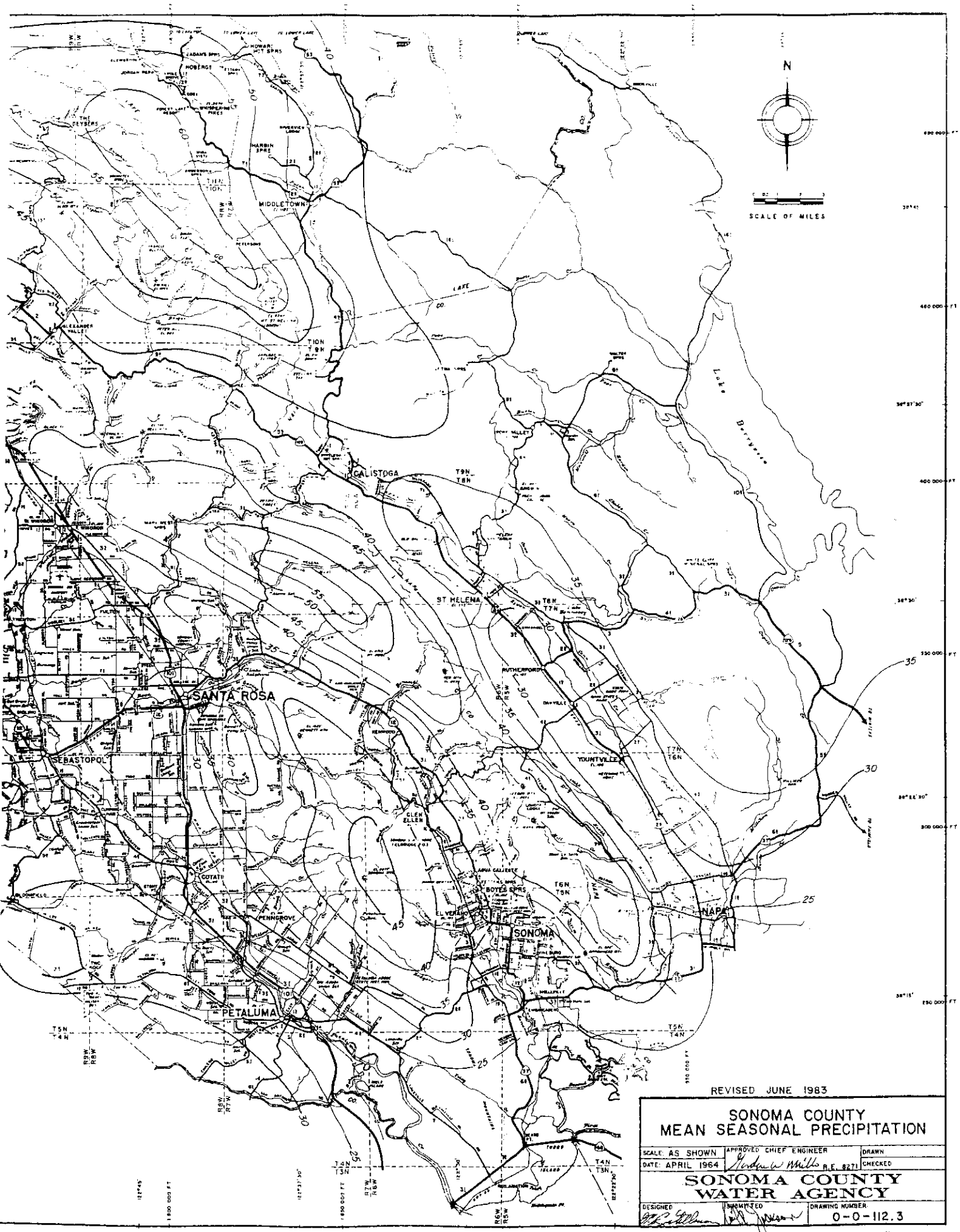
NATURAL GROWTH NOT SHOWN
SEE PHOTOGRAPHS



NOTE:
ISOHYETAL LINES IN MOUNTAINOUS AREAS, AND IN OTHER AREAS WITH LOW RAINGAGE DENSITY ARE BASED ON OROGRAPHIC CONSIDERATIONS. ALL AVAILABLE DATA FROM BOTH LONG-TERM AND SHORT-TERM STATIONS HAVE BEEN USED IN COMPILING THIS MAP.

LEGEND:
LINE OF EQUAL MEAN SEASONAL PRECIPITATION IN INCHES. ——40——

INFORMATION SHOWN IS SUBJECT TO REVISION AS ADDITIONAL RAINFALL DATA BECOME AVAILABLE



REVISED JUNE 1983

SONOMA COUNTY
MEAN SEASONAL PRECIPITATION

SCALE: AS SHOWN	APPROVED: CHIEF ENGINEER	DRAWN
DATE: APRIL 1964	R.E. 8271	CHECKED

SONOMA COUNTY
WATER AGENCY

DESIGNED	SUBMITTED	DRAWING NUMBER: 0-0-112.3

PLATE No. B-3

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MOMENTUM LOSSES AT OBSTRUCTIONS

Project _____

Location _____

File No. _____ Computed By _____ Date _____

Remarks _____

_____

$Q =$ _____ $\frac{Q^2}{g} =$ _____

I Upstream Channel b= _____ z= _____

III Downstream Channel b= _____ z= _____

II Obstruction _____

_____

General Equation: $\underbrace{M_1 - M_0 + \frac{Q^2}{g}\frac{(A_1-A_0)}{A_1^2}}_{\mathrm{I}} = \underbrace{M_1 - M_0 + \frac{Q^2}{g}\frac{1}{A_1-A_0}}_{\mathrm{II}} = \underbrace{M_3 - M_0 + \frac{Q^2}{g\,A_3}}_{\mathrm{III}}$

A_o = Area Of Obstruction

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
d	A_1	$\bar{Y}_1$	M_1	A_3	$\bar{Y}_3$	M_3	A_0	$\bar{Y}_0$	M_0	$\frac{Q^2}{g}\left(\frac{A_1-A_0}{A_1^2}\right)$	$\frac{Q^2}{g}\left(\frac{1}{A_1-A_0}\right)$	$\frac{Q^2}{g}\left(\frac{1}{A_3}\right)$	I (4)-(10)+(11)	II (4)-(10)+(12)	III (7)-(10)+(13)

Sheet ____ of ____

RATIONAL METHOD DRAINAGE STUDY

By:_____ Date_____ Subject_____ Sheet No._____ of_____

Chkd. By_____ Date_____ Storm Freq._____ % _____yr. Job. No._____

Point of Conc.	Area	EL / Distance	Slope	v	Time of Conc. (in minutes) Travel Time	Total Time	I	K	C	ΔA / A Total	KΔAC	ΣKΔAC	Q	Design	Remarks

STANDARD STEP—FLOW PROFILE

Sheet ___ of ___

PROJECT _____

LOCATION _____

FILE NO. _____ COMPUTED BY _____ DATE _____

REMARKS _____

Q _____ n _____

S_o _____ α _____

d_n _____ d_c _____

$$S_f = 29.1(n)^2 \frac{\frac{V^2}{2g}}{R^{4/3}} = _____ \frac{\frac{V^2}{2g}}{R^{4/3}}$$

(1) Station	(2) d	(3) W.S. Elev.	(4) A	(5) V	(6) $\frac{V^2}{2g}$	(7) $\alpha\frac{V^2}{2g}$	(8) Assumed E.L. (3) + (7)	(9) R	(10) $R^{4/3}$	(11) S_f	(12) Average S_f	(13) ΔL	(14) h_f (12)x(13)	(15) Eddy Loss	(16) Actual E.L.

DIRECT STEP — FLOW PROFILE

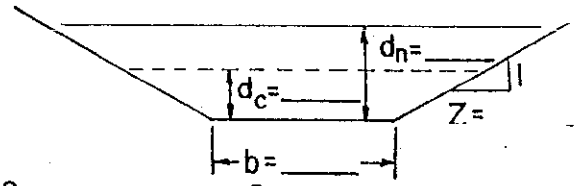
Sheet ____ of ____

PROJECT _____ Q = _____

LOCATION _____ S_o = _____

FILE NO. _____ COMPUTED BY _____ DATE _____ n = _____

REMARKS _____ α = _____



$$S_f = 29.1(n)^2 \frac{\frac{V^2}{2g}}{R^{4/3}} = ____ \frac{\frac{V^2}{2g}}{R^{4/3}}$$

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
d	A	V	$\frac{V^2}{2g}$	$\alpha\frac{V^2}{2g}$	E (1) + (5)	ΔE	R	$R^{4/3}$	S_f	Average S_f	$S_o - S_f$	ΔL (7)÷(12)	Station

Sht ___ of ___

PROJECT _____

FREQUENCY _____

ISOHYETAL ZONE _____

Hydraulic Calculation Sheet

CALCULATED BY _____

CHECKED BY _____

DATE _____

STATION	ELEV. INV.	D	ELEV. W.S.	SECT-ION	A	W.P.	$R^{2/3}$	Q	$\frac{V^2}{2g}$	E.G.	$S_f \times 10^{-2}$	Av. $S_f \times 10^{-2}$	L	h_f	h_b	h_j	h_t	E.G.	BAN M.E

COMPUTATION FORM FOR UNDERGROUND PIPE DRAINAGE SYSTEMS

CATEGORY	PIPE DATA			FLOW DATA					HEAD LOSSES					ELEVATIONS			
ITEM	LENGTH	DIAMETER	AREA	MANNINGS COEFF.	FLOW	VELOCITY	VELOCITY HEAD	FRICTION SLOPE	FRICTION LOSS	CONTRACTION LOSS	ENLARGEMENT LOSS	BENDS & OTHER LOSSES	SUMMATION OF LOSSES	ENERGY GRADE	HYDRAULIC GRADE	INLET GRADE	INVERT GRADE
SYMBOL	L	D	A	n	Q	V	$V^2/2g$	$S_f = 4.66 \frac{n^2 Q^2}{d^{5.33}}$	$H_f = S_f L$	H_C	H_E	H_B	ΣH	E.G.L.	H.G.L.	F.G.	INV.
UNIT / ELEMENT	Ft	Ft	Ft^2		$Ft^3/sec.$	$Ft/sec.$	Ft	Ft/Ft	Ft	Ft	Ft	Ft	Ft	ELEV. IN FT.	ELEV. IN FT	ELEV. IN FT.	ELEV. IN FT

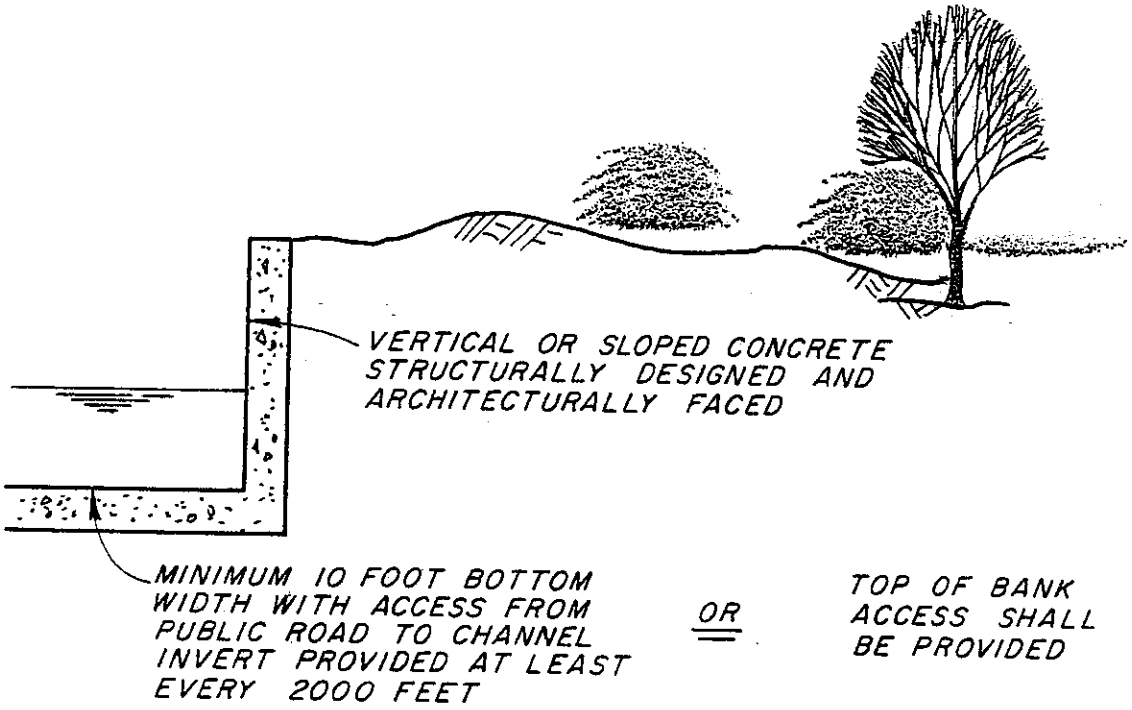
CALC. BY_____ DATE _____ PROJECT _____ SHEET NO.____ OF_____

CHKD. BY_____ DATE _____ _____ JOB NO. _____

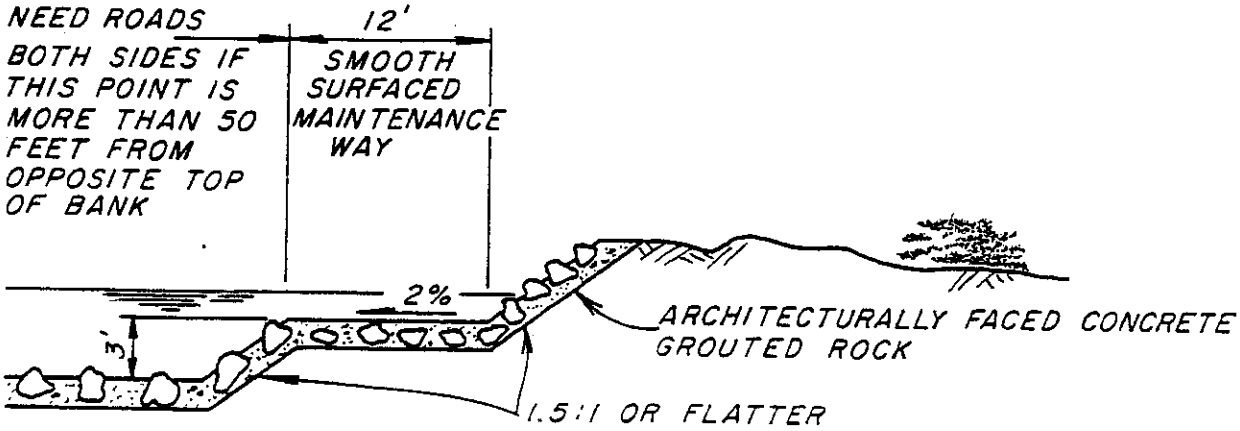
PARTIAL PLANT LIST FOR FLOOD CONTROL CHANNELS AND NATURAL WATERWAYS

	Botanical Name	Common Name
Trees		
1.	Acer Macrophyllum	Big Leaf Maple
2.	Acer negundo californicum	California Box Elder
3.	Aesculus californica	California Buckeye
4.	Ainus rhombifolia	California Alder
5.	Cercis occidentalis	California Redbud
6.	Jugians nigra	Black Walnut
7.	Lithocarpus densiflora	Tanbark Oak
8.	Platanus occidentalis	American Sycamore
9.	Quercus agrifolia	California Live Oak
10.	Quercus kelloggii	Black Oak
11.	Rhamnus californica	Coffeeberry
12.	Sequoia sempervirons	Coast Redwood
13.	Umbellularia californica	California Bay
Shrubs and Groundcover		
14.	Arctostaphylos species	Manzanita
15.	Atriplex lentiformis	Salt Bush
16.	Baccharis pilularis	Coyote Bush
17.	Ceanothus species	Wild Lilac
18.	Cercocarpus betuloides	Western Mountain Mahogany
19.	Myrica californica	Wax Myrtle
20.	Photinia arbutifolia	Toyon
21.	Rhus ovata	Sugar Bush
22.	Ribes viburnifolium	Evergreen Current
23.	Sambucus callicarpa	Coast Red Elderberry
24.	---	Native Grasses & Forbes

SIDE SLOPE, MAINTENANCE ROAD & CHANNEL BOTTOM ALTERNATES

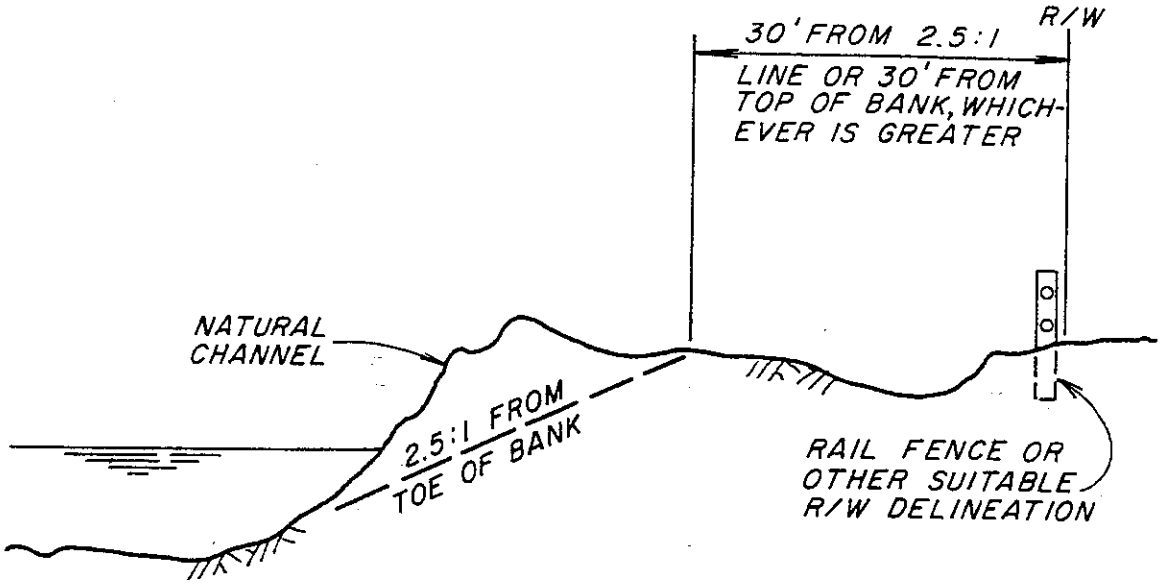


REINFORCED CONCRETE CHANNEL

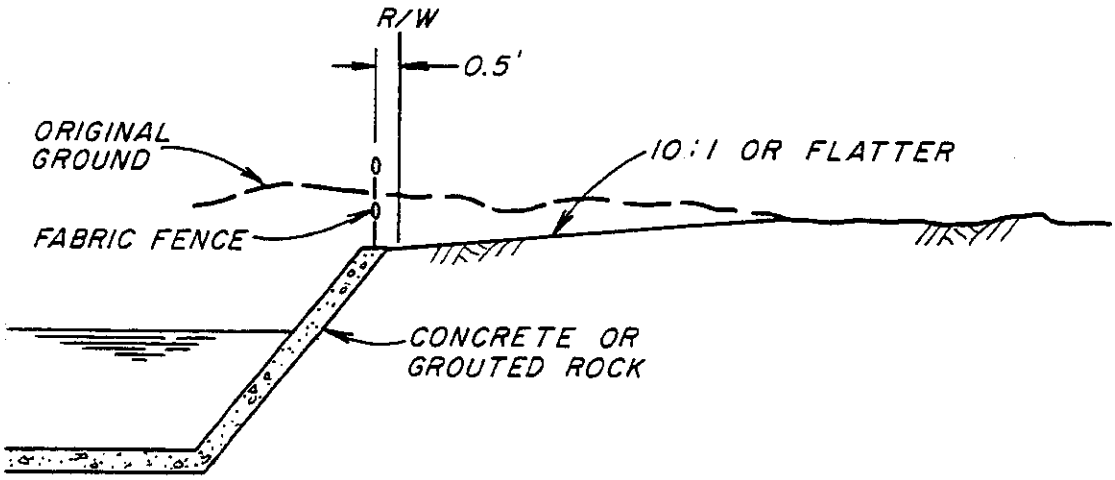


GROUTED ROCK CHANNEL

TOP OF BANK, R/W & FENCING ALTERNATES

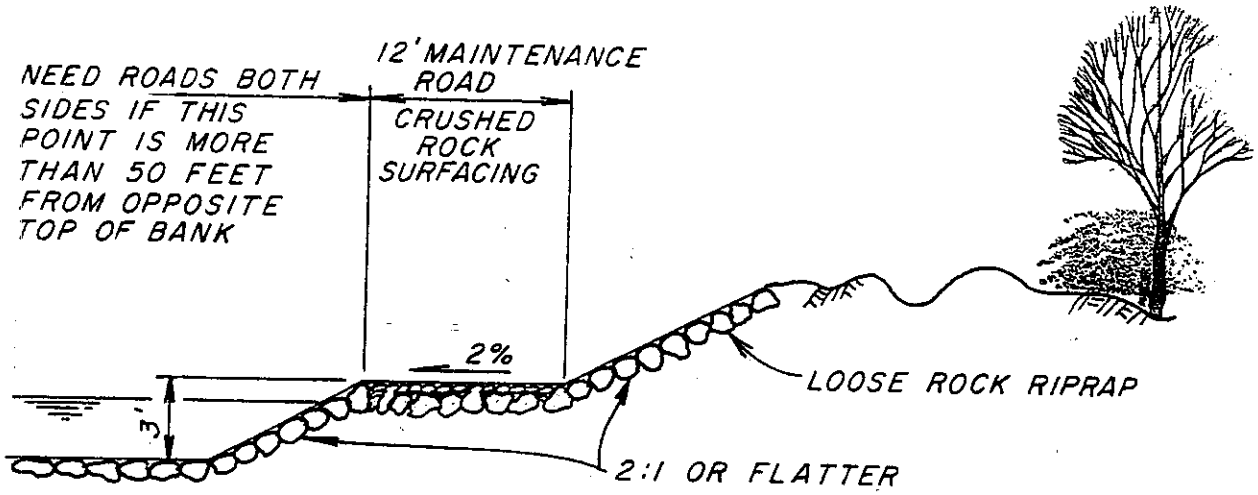


NATURAL CHANNEL

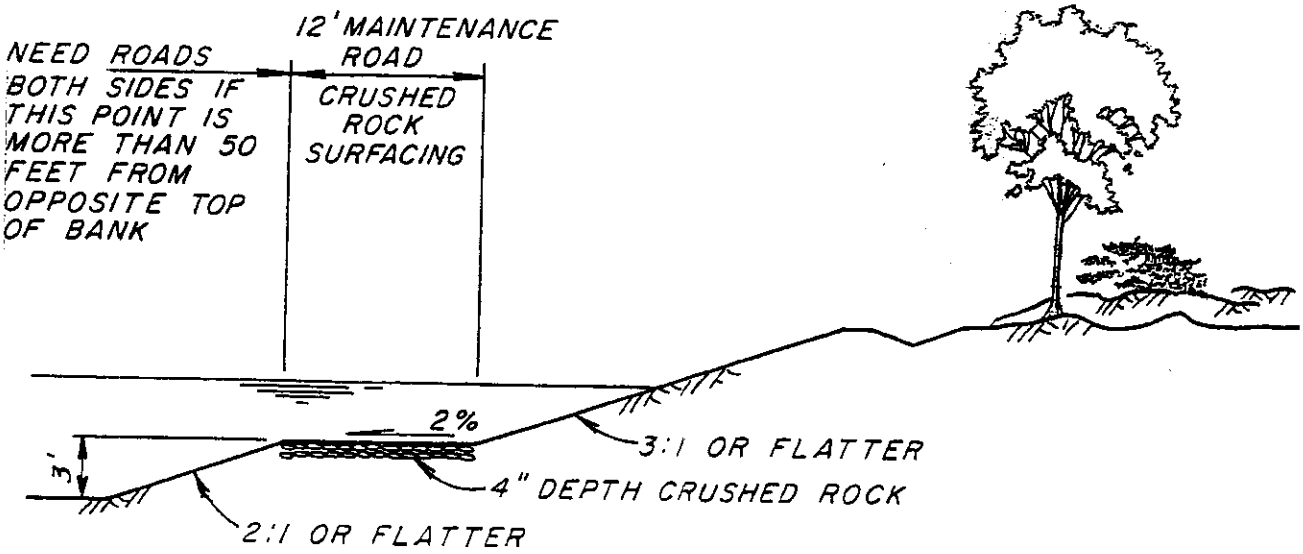


CONCRETE-LINED CHANNEL

SIDE SLOPE, MAINTENANCE ROAD & CHANNEL BOTTOM ALTERNATES

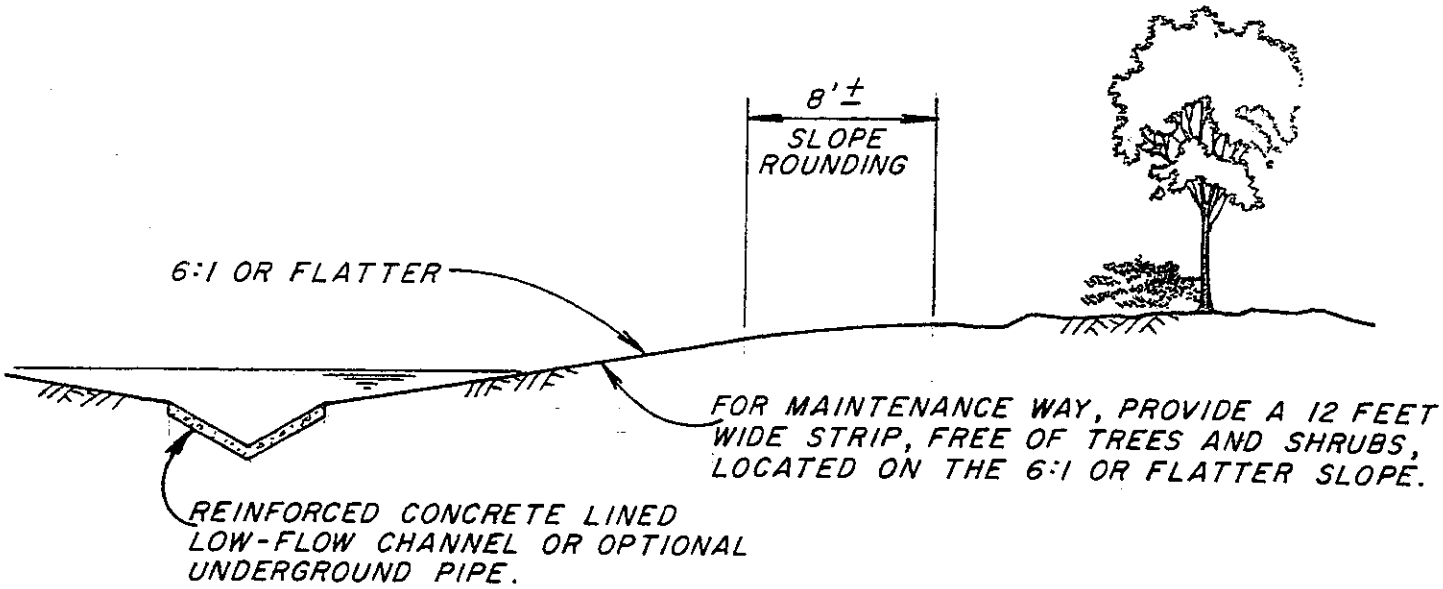


ROCK RIPRAP CHANNEL

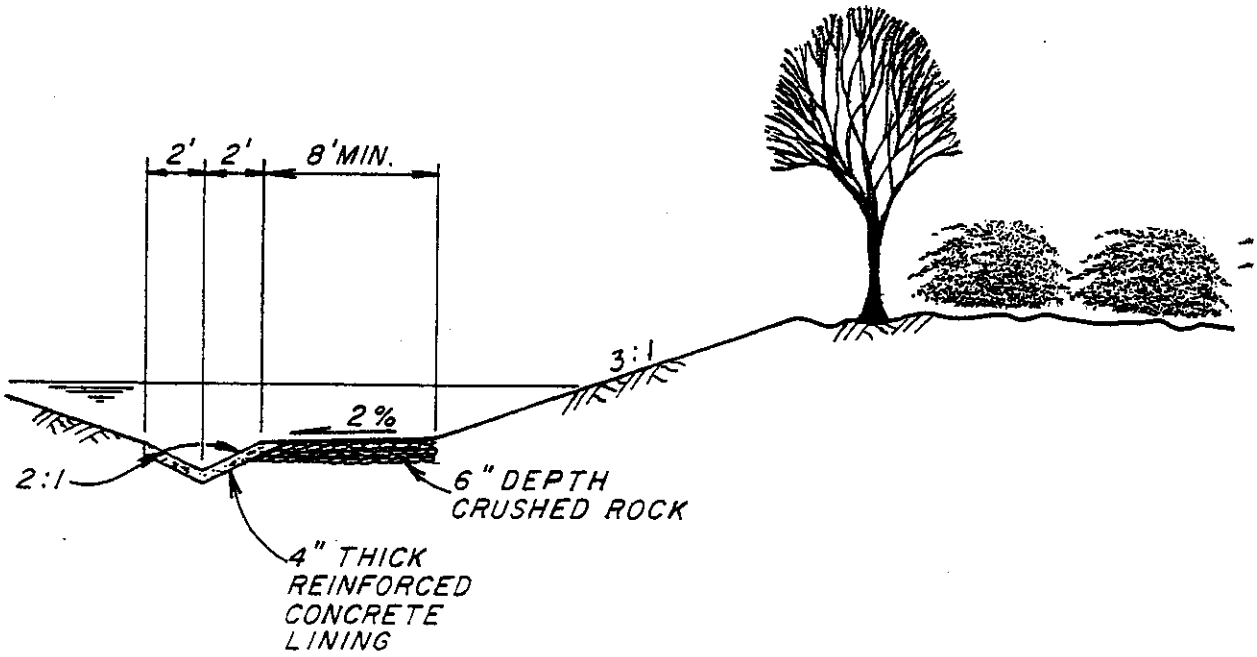


EARTH CHANNEL

SIDE SLOPE, MAINTENANCE ROAD & CHANNEL BOTTOM ALTERNATES

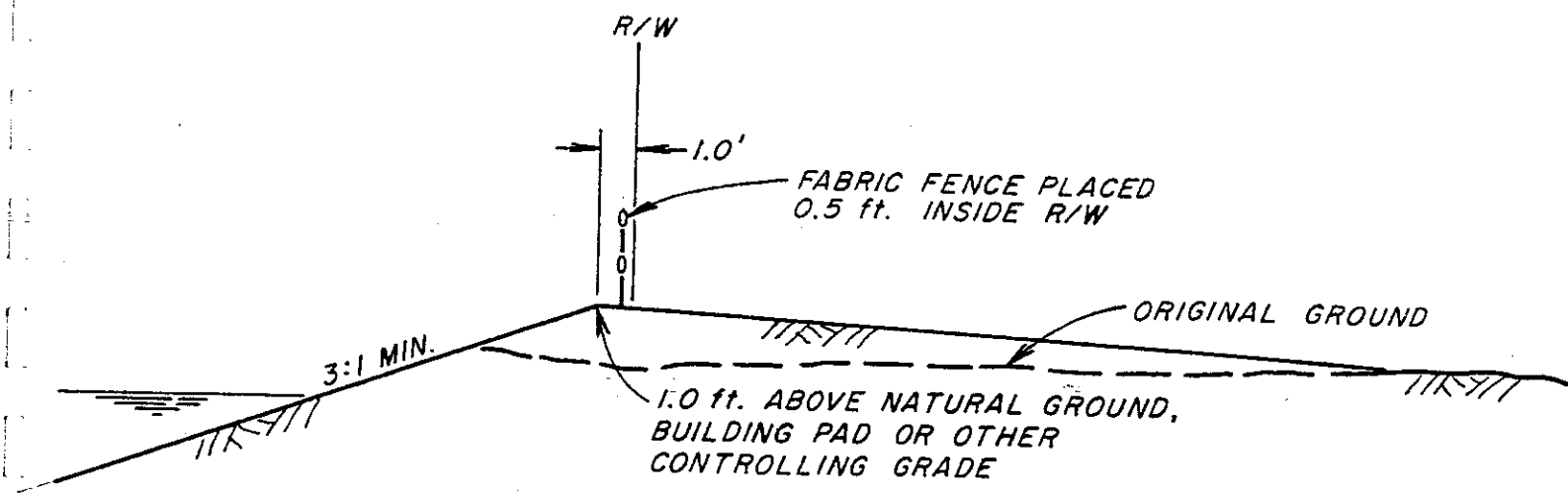


FLAT-BANKED CHANNEL

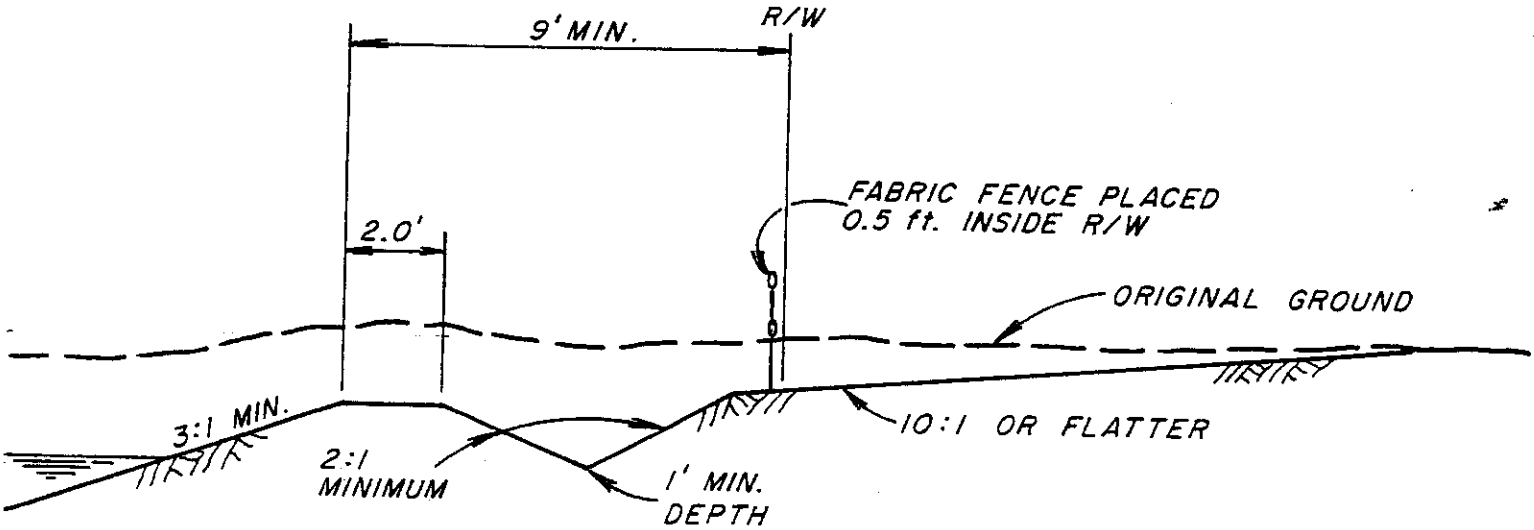


MINIMUM CHANNEL

TOP OF BANK, R/W & FENCING ALTERNATES

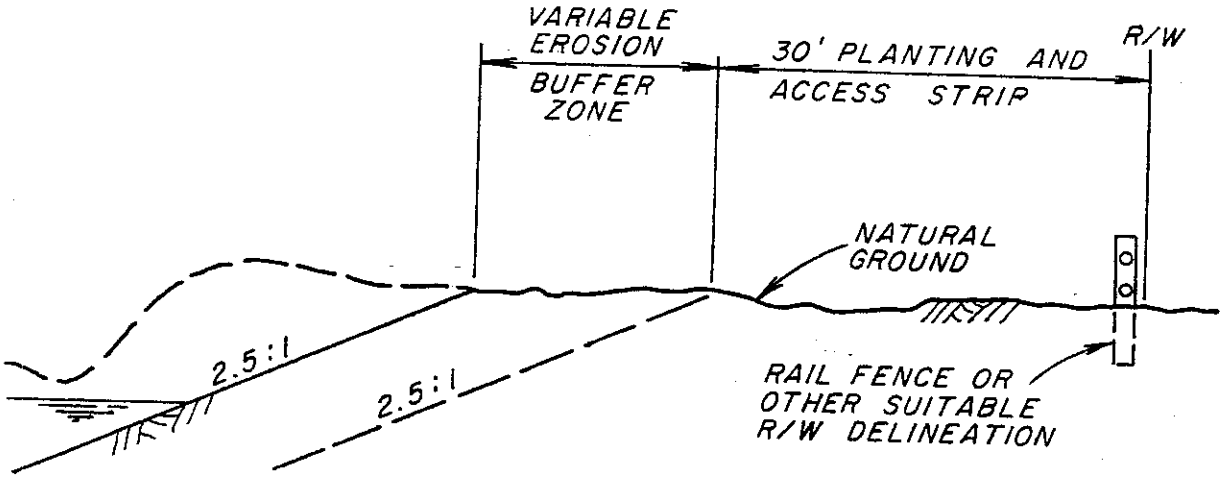


IF NO RUNOFF PASSES INTO THE CREEK
RIGHT OF WAY

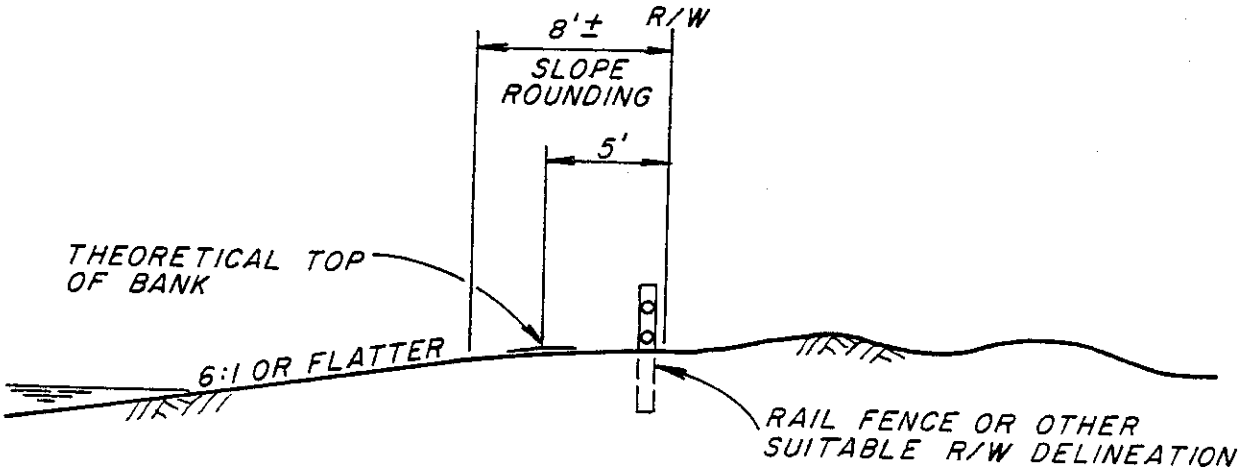


STANDARD CHANNEL

TOP OF BANK, R/W & FENCING ALTERNATES

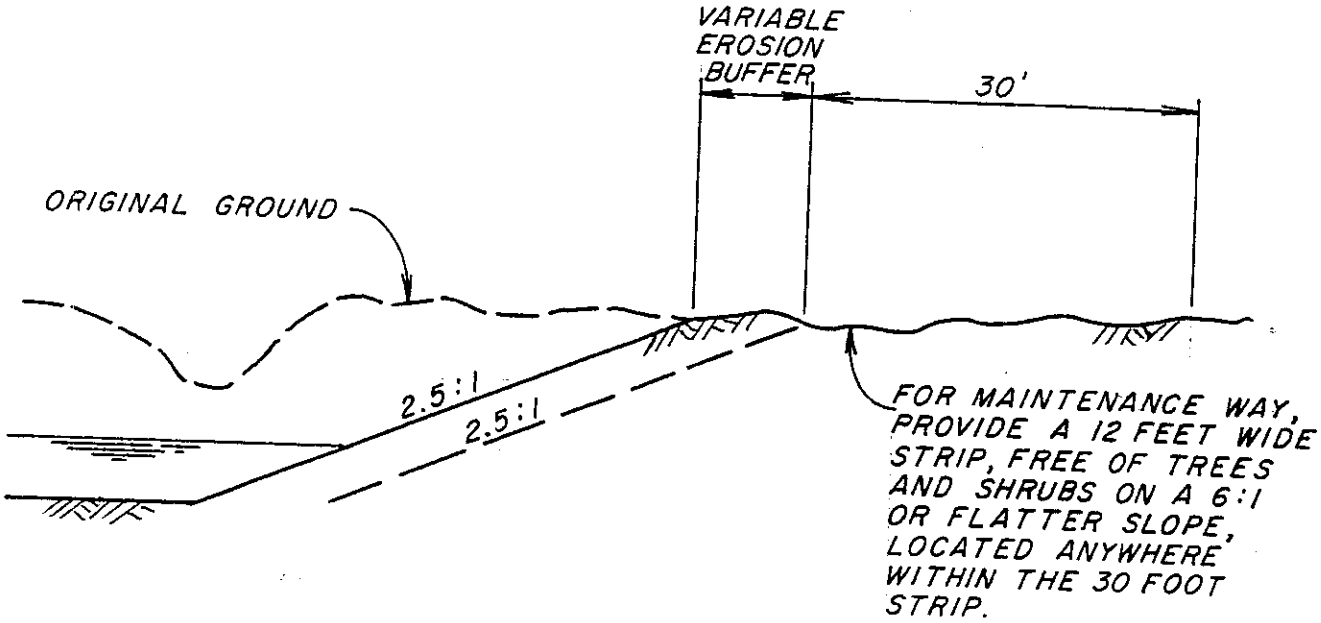


CONSTRUCTED NATURAL WATERWAY

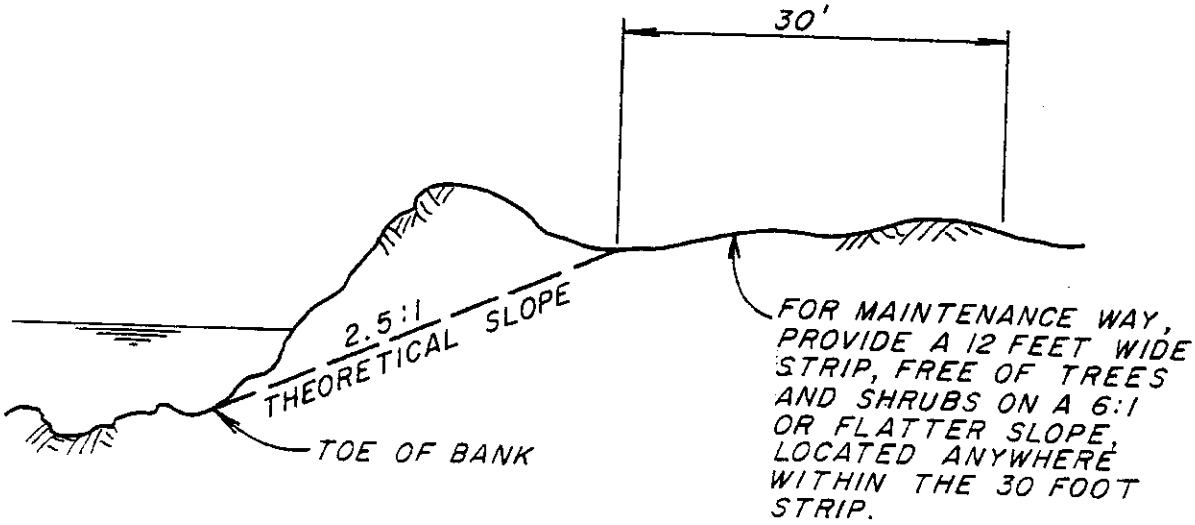


FLAT SIDE SLOPES

SIDE SLOPE, MAINTENANCE ROAD & CHANNEL BOTTOM ALTERNATES

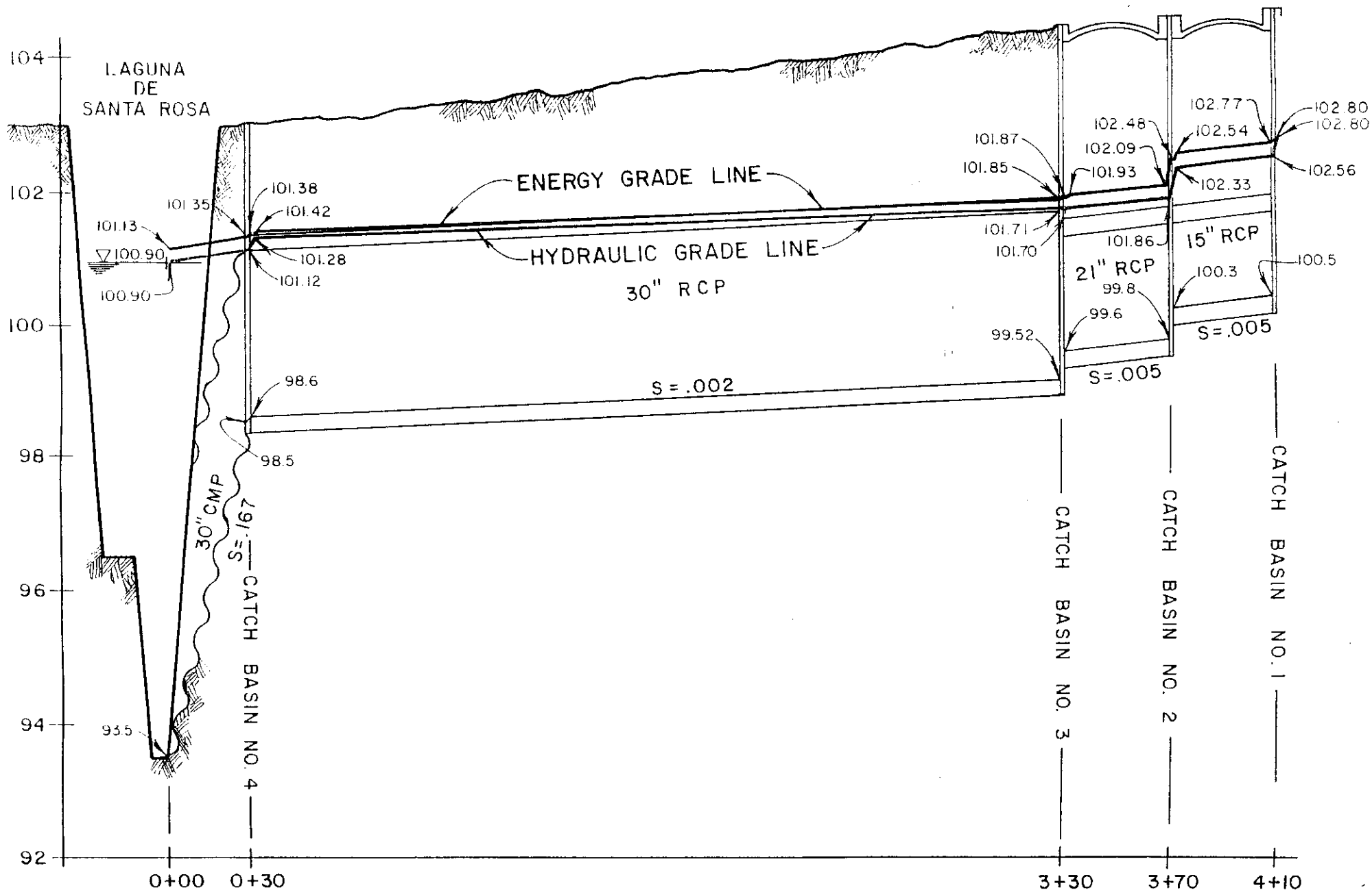


CONSTRUCTED NATURAL WATERWAY
WHERE VELOCITY IS LESS THAN 6 ft./sec.



NATURAL CREEK

SUMMARY OF DESIGN ALTERNATES


LAGUNA DE SANTA ROSA
ENERGY GRADE LINE
HYDRAULIC GRADE LINE
30" RCP
21" RCP
15" RCP
30" CMP
S = .002
S = .005
S = .005
S = .167
CATCH BASIN NO. 4
CATCH BASIN NO. 3
CATCH BASIN NO. 2
CATCH BASIN NO. 1
104
102
100
98
96
94
92
0+00
0+30
3+30
3+70
4+10
101.35
101.38
101.42
101.13
100.90
100.90
101.28
101.12
98.6
98.5
93.5
101.87
101.85
101.71
101.70
99.52
102.48
102.09
101.93
101.86
99.8
99.6
102.77
102.54
102.33
100.3
102.80
102.80
102.56
100.5

EXAMPLE 2

COMPUTATION FORM FOR UNDERGROUND PIPE DRAINAGE SYSTEMS

CATEGORY	PIPE DATA			FLOW DATA					HEAD LOSSES					ELEVATIONS			
ITEM	LENGTH	DIAMETER	AREA	MANNINGS COEFF.	FLOW	VELOCITY	VELOCITY HEAD	FRICTION SLOPE	FRICTION LOSS	CONTRACTION LOSS	ENLARGEMENT LOSS	BENDS & OTHER LOSSES	SUMMATION OF LOSSES	ENERGY GRADE	HYDRAULIC GRADE	INLET GRADE	INVERT GRADE
SYMBOL	L	D	A	n	Q	V	$V^2/2g$	$S_f = 4.66 \frac{n^2 Q^2}{d^{5.33}}$	$H_f = S_f L$	H_C	H_E	H_B	ΣH	E.G.L.	H.G.L.	F.G.	INV.
UNIT / ELEMENT	Ft	Ft	Ft^2		$Ft^3/sec.$	$Ft/sec.$	Ft	Ft/Ft	Ft	Ft	Ft	Ft	Ft	ELEV. IN FT.	ELEV. IN FT.	ELEV. IN FT.	ELEV. IN FT
Laguna															100.90		93.5
Outlet		2.5	4.91		18.8	3.83	0.23				① 0.23		0.23	101.13	100.90		93.5
30" CMP	30	2.5	4.91	0.024	18.8	3.83	0.23	0.00716	⑥ 0.22				0.22				
Inlet		2.5	4.91		18.8	3.83	0.23			② 0.03			0.03	101.35	101.12		98.5
C.B. #4					18.8 / 14.5									101.38		103.0	
Outlet		2.5	4.91		14.5	2.95	0.14				③ 0.04		0.04	101.42	101.28		98.6
30" RCP	300	2.5	4.91	0.014	14.5	2.95	0.14	0.00145	⑥ 0.43				0.43				
Inlet		2.5	4.91		14.5	2.95	0.14			② 0.02			0.02	101.85	101.71		99.2
C.B. #3					14.5 / 9.3									101.87		103.6	
Outlet		1.75	2.41		9.3	3.86	0.23				③ 0.06		0.06	101.93	101.70		99.6
21" RCP	40	1.75	2.41	0.014	9.3	3.86	0.23	0.00399	⑥ 0.16				0.16				
Inlet		1.75	2.41		9.3	3.86	0.23			② 0.04			0.04	102.09	101.86		99.8
C.B. #2					9.3 / 4.5							④ 0.35	0.35	102.48		103.7	
Outlet		1.25	1.23		4.5	3.66	0.21				③ 0.06		0.06	102.54	102.33		100.3
15" RCP	40	1.25	1.23	0.014	4.5	3.66	0.21	0.00563	⑥ 0.23				0.23				
Inlet		1.25	1.23		4.5	3.66	⑤ 0.21			② 0.03			0.03	102.77	102.56		100.5
C.B. #1					4.5									102.80	102.80	103.8	

TYPICAL HEAD LOSS VALUES. USE OTHER VALUES WHERE APPROPRIATE.

① HEAD LOSS AT OUTLET – 1.0 $V^2/2g$

② HEAD LOSS AT CONTRACTION – 0.15 $V^2/2g$

③ HEAD LOSS AT ENLARGEMENT – 0.25 $V^2/2g$

④ HEAD LOSS AT 90° TURN – 1.5 $V^2/2g$

⑤ CONVERSION AT ENTRANCE – 1.0 $V^2/2g$

⑥ HEAD LOSS BY PIPE FLOW – $S_f \times L$

CALC. BY _____ DATE _____ PROJECT EXAMPLE 2 SHEET NO. 1 OF 1

CHKD. BY _____ DATE _____ JOB NO. _____

Note: Ultimate development of this area is commercial and mult-residential.

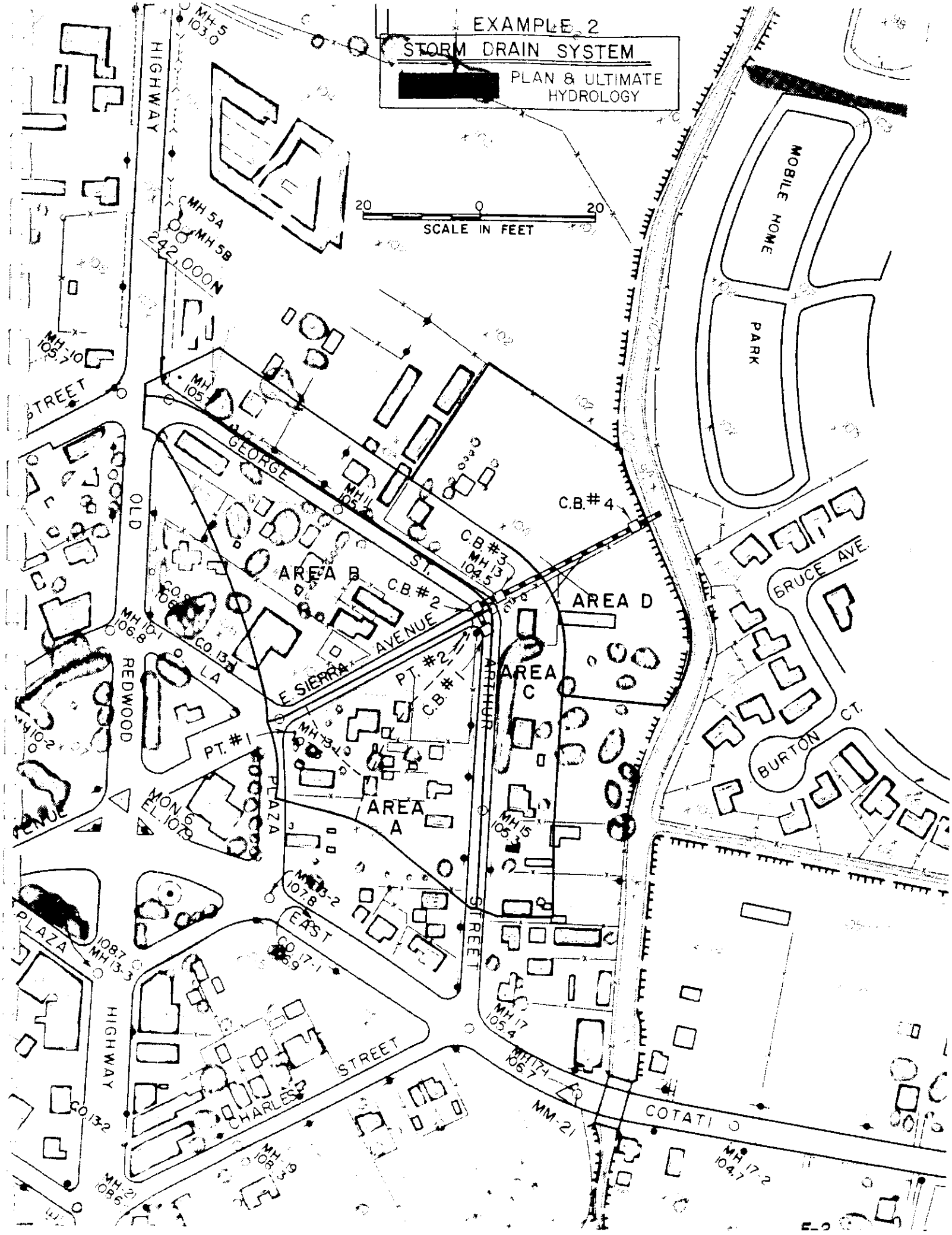
RATIONAL METHOD DRAINAGE STUDY

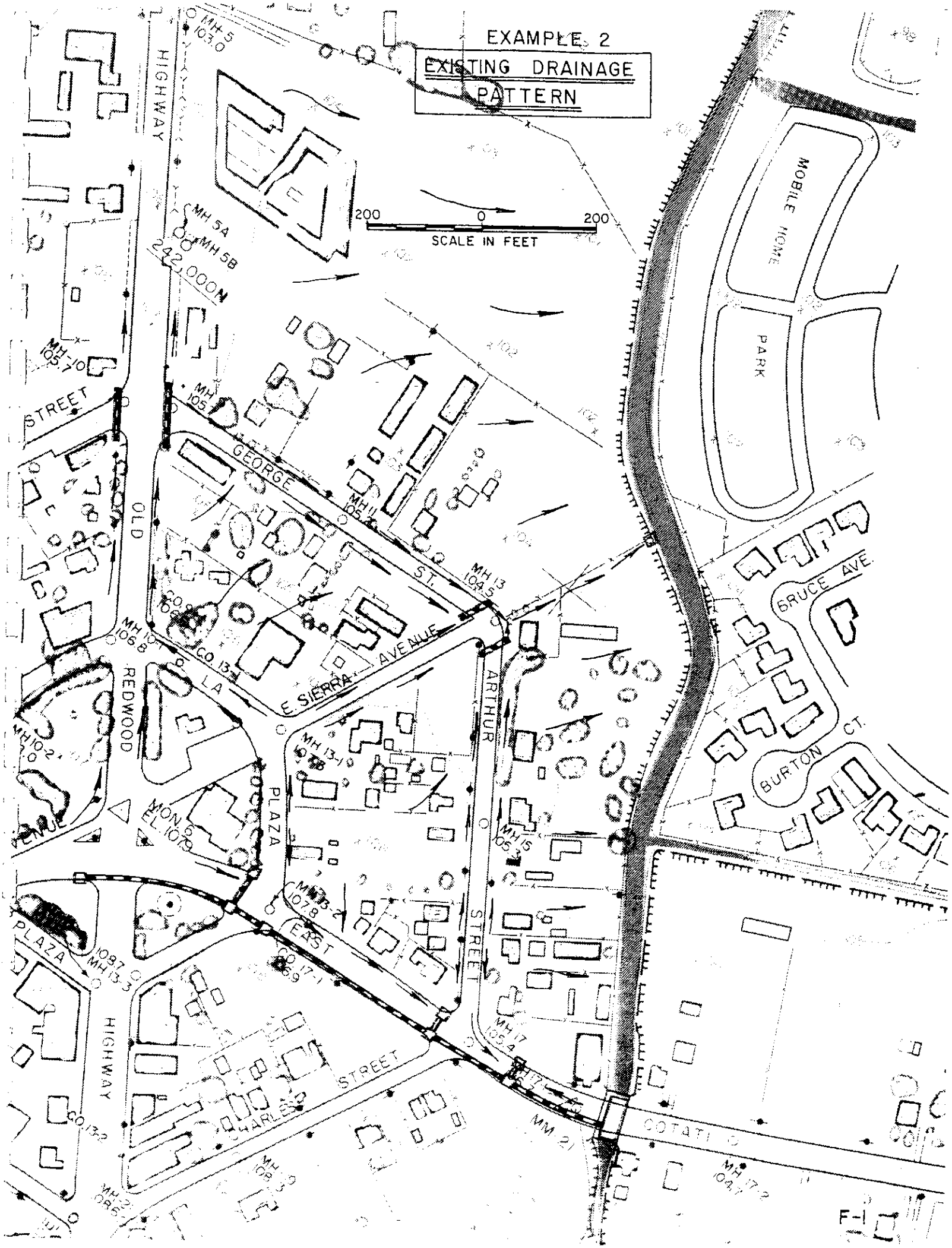
By: M. L. Date 1-11-73 Subject Hydrology Example 2 Sheet No. 1 of 1

Chkd. By R. S. Date 1-23-73 Storm Freq. 10 % 10 yr. Total drainage area is less than one sq. mile. Job. No.

Point of Conc.	Area	EL ft. / ft. Distance	Slope ft./ft.	v ft/sec	Time of Conc. (in minutes) Travel Time	Total Time	i in/hr.	average rainfall 29"/yr. K	C	ΔA acres / A Total	KΔAC	ΣKΔAC	Q ft.³/sec.	Design	Remarks
Point 1	A	107.3			10 min.	10 min.	2.10	0.97	0.90	.51 / .51	.45	.45	.93	runoff to street	
Point 2	A	104.7 / 390	.0067	approx 2.0	3.2	13.2	1.84	0.97	0.90	.80 / 1.31	.70	1.15	2.10	gutter flow	E. Sierra Avenue
CB #1	A					13.2	1.84	0.97	0.90	1.48 / 2.79	1.29	2.44	4.5		Enter CB #1
CB #2	B	40		3.6	0.2	13.4	1.82	0.97	0.90	3.05 / 5.84	2.66	5.10	9.3	Assume 15" RCP	$V=\frac{Q}{A}=\frac{4.5}{1.23}=3.$
CB #3	C	40		5.2	0.1	13.5	1.81	0.97	0.90	3.35 / 9.19	2.92	8.02	14.5	Assume 18" RCP	$V=\frac{9.3}{1.78}=5.2$ ft/s
CB #4	D	300		4.6	1.1	14.6	1.75	0.97	0.90	3.09 / 12.28	2.70	10.72	18.8	Assume 24" RCP	$V=\frac{14.5}{3.14}=4.6$ ft/s
														Assume 24" CMP	

118-1 Rev. 7/64


EXAMPLE 2
STORM DRAIN SYSTEM
[redacted] PLAN & ULTIMATE HYDROLOGY
20 0 20
SCALE IN FEET
HIGHWAY
MH 5
103.0
MH 5A
MH 5B
242,000N
MH 105.10
STREET
MH 105
GEORGE
MH 11
105
C.B. # 4
C.B. #3
MH 13
104.5
AREA B
C.B. #2
AREA D
BRUCE AVE.
MOBILE HOME
PARK
OLD
MH 10.1
106.8
CO. 13.1
LA
REDWOOD
E. SIERRA
AVENUE
PT. #2
C.B. #1
AREA C
PT. #1
MH 13-1
AREA A
MON 6
EL 107.9
PLAZA
MH 15
106.3
BURTON
CT.
MH 13-2
107.8
EAST
STREET
PLAZA
108.7
MH 13-3
CO. 17-1
HIGHWAY
MH 17
105.4
MH 17-1
106.7
CHARLES
STREET
CO. 13-2
MM-21
COTATI
MH 17-2
104.7
MH 108.9
MH 108.2


EXAMPLE 2
EXISTING DRAINAGE PATTERN
200 0 200
SCALE IN FEET
HIGHWAY
MH 5
103.0
MH 5A
MH 5B
242,000N
MH 105.7-10
STREET
MH 105
GEORGE
ST.
MH 13
104.5
OLD
REDWOOD
LA
CO. 13
E. SIERRA AVENUE
ARTHUR
STREET
PLAZA
MH 13-1
MH 15
105.3
MH 13-2
107.8
EAST
STREET
PLAZA
MH 13-3
HIGHWAY
CHARLES
STREET
MH 17
105.4
COTATI
MH 17-2
104.7
MOBILE HOME
PARK
BRUCE AVE.
BURTON CT.
F-1

Tributary 4 – con'd

From point 5 to point 6

Q at point 5 = 122 c.f.s.

Estimated Q at point 6 = 140 c.f.s.

Average Q between points 5 & 6 $= 122 + \frac{140-122}{2} =$ 131 c.f.s.

Assume 42" RCP flowing full

$$V = \frac{Q}{A} = \frac{131}{9.62} = 13.6 \text{ ft/sec.}$$

$$\text{Travel time} = \frac{1950 \text{ ft.}}{(13.6 \text{ ft./sec.})(60 \text{ sec/min.})} = 2.4 \text{ min.}$$

ORDINANCE NO. 5402 & 5373
COUNTY FIRE CODE

SECTION II. Section 13-17 of the Sonoma County Code is amended to read:

Sec. 13-17. California Fire Code, Uniform Fire Code Standards, and National Fire Codes adopted - Amendments.

(a) The California Fire Code, save and except such portions as are hereinafter deleted, modified, or amended by subsection (b) of this section, the Uniform Fire Code Standards, and the National Fire Codes, save and except: (1) NFPA 1500, Standard on Fire Department Occupational Safety and Health Program, (2) NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, (3) NFPA 1720, Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations, and Special Operations to the Public by Volunteer Fire Departments, are adopted and incorporated as fully as if set out at length herein for the purpose of prescribing regulations governing conditions hazardous to life and property from fire, hazardous materials or explosion within the unincorporated area of the county.

(b) The California Fire Code is amended and changed in the following respects:

(1) Section 103.1.4.1 is amended to read as follows:

103.1.4.1 The board of appeals shall determine the suitability of alternate materials and types of construction, provide for reasonable interpretations of the provisions of this code, and hear appeals from decisions of the chief. The board shall render all decisions and findings in writing to the appellant with duplicate copies to the building official and the chief.

(2) Section 103.1.6 is added to read as follows:

103.1.6 Special reports. The chief is authorized to require the owner or the person in possession or control of a building or premises where hazardous materials are stored to periodically provide, without charge to the jurisdiction, a special report assessing hazardous materials storage at the building or premises and, where appropriate, making recommendations concerning safer storage of hazardous materials at the building or premises. The report shall be prepared by a qualified professional acceptable to the chief. The recommendations of the report shall be consistent with the provisions of the code. The report shall be filed with the chief and the owner of the building or premises. Within thirty (30) days after receiving the report, the owner of the building or premises shall either file a plan with the chief for implementing the recommendations of the report or demonstrate, to the satisfaction of the chief, why the recommendations should not be implemented.

a.6. **Apartment, hotel, motel.** To operate an apartment house, hotel, or motel.

(6) Subsection a.7 is added to Section 105.8 to read as follows:

a.7. **Automatic fire-extinguishing system.** Installation of a new automatic fire-extinguishing system or modification/installation of seven or more sprinkler heads on an existing system.

(7) Subsection b.3 is added to section 105.8 to read as follows:

b.3 **Bonfires or rubbish fires.** To kindle or authorize the kindling or maintenance of bonfires or rubbish fires.

(8) Subsection d.3 is added to Section 105.8 to read as follows:

d.3. **Day Care.** To operate a day care occupancy with an occupant load over eight (8) persons.

(9) Subsection d.4 is added to Section 105.8 to read as follows:

d.4. **Excavation near flammable or combustible liquid pipeline.** To excavate or do any work below grade within ten (10) feet of any pipeline for the transportation of flammable or combustible liquid.

(10) Subsection f.6 is added to Section 105.8 to read as follows:

f.6. **Fire alarm systems, fixed rate of rise and manual.** Installation of any fire alarm system.

(11) Subsection f.7 is added to Section 105.8 to read as follows:

f.7. **Fire alarm system, major modification, repairs.** To make a major modification or to repair any fire alarm system.

(12) Subsection f.8 is added to Section 105.8 to read as follows:

f.8. **Fire alarm systems, smoke detectors and manual.** Installation of any fire alarm system.

(13) Subsection f.9 is added to Section 105.8 to read as follows:

f.9. **Fire water underground piping.** A separate utility permit from the building official is required prior to installing any private fire water underground piping and associated appliances.

o.5. **Open flame devices.** To use open flame devices for maintenance or repair of boats, slips, or wharves.

(23) Subsection o.6 is added to Section 105.8 to read as follows:

o.6 **Propane/LPG tank installation.** To install propane/LPG tanks in excess of 125 gallon capacity.

(24) Section 105.9 is added to read as follows:

105.9 Occupancy Permits. The chief may notify the building official not to authorize temporary or final occupancy of any new building for which a permit is required by this code until the building has been inspected and found to be in compliance with this code. The building official shall not authorize temporary or final occupancy of any new commercial building for which a permit is required by this code until the contractor provides a fire flow availability certification to the chief. The fire flow availability certification shall include static pressure, residual pressure, and gallons per minute, as witnessed by or acceptable to the chief.

(25) Section 105.10 is added to read as follows:

105.10 Temporary Connection Permits. Nothing in Section 105 shall prohibit the granting of a temporary connection permit for gas or electricity to allow construction to occur.

(26) Section 203 is amended to add the definition of "board of appeals" to read as follows:

BOARD OF APPEALS is the board of building appeals created in Chapter 7 of the Sonoma County Code.

(27) Section 203 is amended to revise the definition of "building" to read as follows:

BUILDING is any structure used or intended for supporting or sheltering any use or occupancy. Building is also any structure as to which state agencies have regulatory power, and housing or enclosure of persons, animals, chattels, equipment or property of any kind. Building is also any structure wherein things may be grown, made, produced, kept, handled, stored or disposed of, and all appendages, accessories, apparatus, appliances and equipment installed as a part thereof. Building shall not include machinery, equipment or appliances installed for manufacture or process purposes only, nor shall it include any construction installations which are not a part of a building, any tunnel, mine shaft, highway or bridge, or include any house trailer or vehicle which conforms to the Vehicle Code.

NOTE: Building shall have the same meaning as defined in Health and Safety Code section 17920 and 18908 for the applications specified in Sections 101.17.9 and 101.17.10 of the Building Code.

(35) Section 204 is amended to add the definition of "county fire chief" to read as follows:

COUNTY FIRE CHIEF is as defined in Section 13-6 of the Sonoma County Code.

(36) Section 205 is amended to add the definition of "dairy milking facility" to read as follows:

DAIRY MILKING FACILITY is a single story structure constructed of non-combustible materials with two or more open sides that is used exclusively for milking dairy animals. A dairy milking facility may have either an office or a storage area of less than 400 square feet. A dairy milking facility shall not have any sleeping areas within the structure.

(37) Section 205 is amended to add the definition of "director of forestry and fire protection" to read as follows:

DIRECTOR OF FORESTRY AND FIRE PROTECTION is the Director of the California Department of Forestry and Fire Protection.

(38) Section 206 is amended to change the definition of "executive body" to read as follows:

EXECUTIVE BODY is the Board of Supervisors of Sonoma County for those portions of the county not in a fire protection district, and the board of directors of the fire protection district having jurisdiction for those portions of the county in a fire protection district.

(39) Section 206 is amended to add the definition of "existing building" to read as follows:

EXISTING BUILDING. See "building, existing."

(40) Section 207 is amended to add the definition of "fire alarm" to read as follows

FIRE ALARM is any device, control or circuit designed to produce an alarm signal in the event of fire or system activation, together with the energy necessary to sound an alarm, electrically supervise the system where required, and activate the alarm bells, trouble bells or trouble signals. See Section 1007.

(41) Section 207 is amended to change the definition of "fire department" to read as follows:

FIRE DEPARTMENT is the department of emergency services of the county for those portions of the county not in a local fire protection district, and the local fire protection district having jurisdiction for those portions of the county in a local fire protection district.

PRIVATE RIDING ARENA is an enclosed or unenclosed building or portion of a building used exclusively for private equestrian activities by the building owner, guests, or employees, not to exceed a maximum capacity of thirty (30) persons. The area within a private riding arena shall not be used for storage areas, animal stalls, offices, viewing areas, shows, events, public riding lessons, or similar uses or occupancies. A private riding arena shall be classified as a Group U, Division 3 Occupancy.

(52) Section 219 is amended to add the definition of "roadway" to read as follows:

ROADWAY is as defined in Section 13-6 of the Sonoma County Code.

(53) Section 220 is amended to add the definitions of "shall" and "may" to read as follows:

SHALL is mandatory and **MAY** is permissive, however, use of the word "shall" in this code is not intended to, nor shall it be deemed to create a mandatory duty imposed by enactment within the meaning of Government Code section 815.6.

(54) Section 220 is amended to add the definition of "single-family dwelling" to read as follows:

SINGLE-FAMILY DWELLING is a dwelling that contains one dwelling unit for one family of one or more persons. Single-family dwelling does not include a dwelling used for a large family day-care home, lodging house, congregate residence, or other similar use.

(55) Section 220 is amended to add the definition of "standard specifications for highway bridges" to read as follows:

STANDARD SPECIFICATIONS FOR HIGHWAY BRIDGES is the Standard Specifications for Highway Bridges 16th Edition, 1998, published by the American Association of State Highway and Transportation Officials.

(56) Section 220 is amended to add the definition of "subdivision ordinance" to read as follows:

SUBDIVISION ORDINANCE is the Subdivision Ordinance of Sonoma County.

(57) Section 221 is amended to add the definition of "two-family dwelling" to read as follows:

TWO-FAMILY DWELLING is a dwelling that contains two dwelling units for two families of one or more persons. Two-family dwelling does not include a dwelling used for a large family day-care home, lodging house, congregate residence, or other similar use.

(58) Section 901.4.2 is amended to read as follows:

901.4.2 Fire apparatus access roads. When required, approved signs or other approved notices shall be provided and maintained for fire apparatus access roads to identify such roads and prohibit the obstruction thereof or both. When used, "NO PARKING"

control of the premises to paint the curbs red or install signs or other appropriate notice to the effect that parking is prohibited by order of the fire department. It shall thereafter be unlawful for such owner, lessee, or other person in charge or control to fail to install and maintain in good condition the form of notice so prescribed. When a fire apparatus access road is marked or signed as provided herein, no person shall park or leave standing any vehicle on the roadway.

(64) Section 902.2.4.4 is added to read as follows:

902.2.4.4 Obstruction. The required roadway width of a fire apparatus access road shall not be obstructed in any manner, including parking of vehicles. Minimum required widths and clearances established under Section 902.2.2 shall be maintained at all times. No owner, lessee, or other person in charge or control of any premises shall, after receiving notice thereof, permit or allow any activity, practice, or condition to occur or exist on the premises which lessens, obstructs, or impairs the access required under this section.

(65) Exception 4 is added to Section 1003.1.2 to read as follows:

4. Automatic sprinkler systems in Group R, Division 3 Occupancies three stories or less may be in accordance with NFPA Standard 13-D, as adopted in Chapter 13 of the Sonoma County Code. These occupancies shall have sprinkler coverage in addition to that required by the UBC Standards or the NFPA Standards listed above in accessible attics and in attached Group U Occupancies as specified by Administrative Regulations issued pursuant to Chapter 13 of the Sonoma County Code.

(66) Section 1003.1.3 is added to read as follows:

1003.1.3 Modifications. When residential sprinkler systems as set forth in the Building Code (See UBC Standard 9-3) are provided, exceptions to, or reductions in, Building Code requirements based on the installation of an automatic fire-extinguishing system are not allowed.

(67) Section 1003.1.4 is added to read as follows:

1003.1.4 Substitutions. Fire resistive substitution as specified in Section 508 of the Building Code shall be permitted when an automatic fire-extinguishing system is not required throughout a building by other sections of this code.

(68) Section 1003.2.1 is amended to read as follows:

1003.2.1 General. An automatic fire-extinguishing system shall be installed in new and existing buildings as set forth in this section.

(69) Section 1003.2.2 is amended to read as follows:

1003.2.2 New buildings. An automatic fire-extinguishing system shall be installed throughout all new buildings, regardless of floor area or intended use.

EXCEPTIONS:

1. Detached Group U, Division 1 Occupancies.

(b) No compartment has a floor area greater than 5,000 square feet.

3. Group U, Division 3 Occupancies except private riding arenas.
4. Private riding arenas, provided that all of the following conditions are met:

(a) The building has a minimum of 60 feet of clearance to property lines or other structures on all sides.
(b) The building has an on-site water supply complying with the requirements of this code.
(c) The building has an annual fire inspection by the chief.
(d) The portions of the building that are not part of the private riding arena are equipped with an automatic fire-extinguishing system and are separated from the private riding arena by area separation walls meeting the requirements of Section 504.6 and Table 5-A of the Building Code.

5. Canopied winery crush pads, provided that all of the following conditions are met:

(a) The canopy and supporting structure are constructed of non-combustible materials.
(b) If attached, the crush pad is separated from other portions of the building by one-hour fire-resistive walls.
(c) The crush pad is not used for storage of combustible materials.

6. Dairy milking facilities.

(71) Sections 1003.2.4.1 through 1003.2.4.3, inclusive, are deleted and Section 1003.2.4 is amended to read as follows:

1003.2.4 Additions to existing single-family and two-family dwellings. An automatic fire-extinguishing system shall be installed throughout all existing single-family and two-family dwellings when the floor area is increased in such a way that seventy-five percent (75%) or more of the exterior walls are replaced.

(72) Section 1003.2.5.1 is deleted and Section 1003.2.5 is amended to read as follows:

1003.2.5 Elevation of existing buildings. An automatic fire-extinguishing system shall be installed throughout all existing buildings when the building is elevated to: (i) three or more stories, or (ii) more than 35 feet in height from grade to the finished ceiling or exposed roof.

(a) The building has a minimum of 60 feet of clearance to property lines or other structures on all sides.

(b) The building has an on-site water supply complying with the requirements of this code.

(c) The building has an annual fire inspection by the chief.

(d) The portions of the building that are not part of the private riding arena are equipped with an automatic fire-extinguishing system and are separated from the private riding arena by area separation walls meeting the requirements of Section 504.6 and Table 5-A of the Building Code.

4. Canopied winery crush pads, provided that all of the following conditions are met:

(a) The canopy and supporting structure are constructed of non-combustible materials.

(b) If attached, the crush pad is separated from other portions of the building by one-hour fire-resistive walls.

(c) The crush pad is not used for storage of combustible materials.

5. Dairy milking facilities.

(74) Section 1003.2.7 is amended to read as follows:

1003.2.7 Changes in occupancy. An automatic fire-extinguishing system shall be installed throughout all existing buildings when a change in occupancy results in a change to the group or division classification of the building and an increase in the hazard classification for the building, as defined in Table 3-A of the Building Code.

(75) Section 1003.2.8 is amended to read as follows:

1003.2.8 Conversions of existing single-family and two-family dwellings. An automatic fire-extinguishing system shall be installed throughout all existing single-family and two-family dwellings when converted to a large family day-care home, lodging house, congregate residence, or other similar use.

(76) Sections 1003.2.9 and 1003.2.10 are deleted.

(77) Section 1006.2.1.1.1 added to read as follows:

1302.3.1 Definitions. For the purposes of section 1302.3, the following definitions shall apply:

EMERGENCY is an occasion that reasonably calls for a response by the fire department. A response due to failure of an alarm system or to personnel error is not an emergency.

FALSE ALARM is an alarm signal necessitating response by the fire department when an emergency does not exist.

1302.3.2 Notice of False Alarm. The chief or his or her authorized representative shall determine whether an emergency exists at the time the fire department responds to an alarm signal from a fire alarm system. If the chief or his or her authorized representative determines that an emergency does not exist, the chief shall issue a written notice of false alarm to the owner or person in charge or control of the facility where the alarm signal originated.

1302.3.3 Hearing on Notice. Any person receiving a notice of false alarm who contends that the chief erroneously determined that an emergency did not exist may file a written request with the chief for a hearing on the determination within ten (10) days after receipt of the notice of false alarm. The chief shall give the requesting party a hearing on the determination within thirty (30) days of receipt of the request. The request shall set forth: (1) why an emergency existed, or (2) why the false alarm resulted from an act of God, flooding, or other violent natural condition without fault and beyond the control of the requesting party. Within ten (10) days of the hearing, the chief shall give written notice of his or her decision to the requesting party.

1302.3.4 Unreliable Fire Alarm Systems. The chief may determine a fire alarm system to be unreliable upon receipt of more than four (4) false alarms within a twelve (12) month period. Upon finding that an alarm system is unreliable, the chief may order the following:

1. Upon the fifth (5th) and sixth (6th) false alarms from the alarm system within a twelve (12) month period, the system owner shall pay a mitigation fee to the fire department of $150.00, plus the cost of fire engine response, as specified in the fire department's approved fee ordinance, for each occurrence.
2. Upon the seventh (7th) and eighth (8th) false alarms from the alarm system within a twelve (12) month period, the system owner shall pay a mitigation fee to the fire department of $300.00, plus the cost of fire engine response, as specified in the fire department's approved fee ordinance for each occurrence.
3. Upon the ninth (9th) and following false alarms from the alarm system within a twelve (12) month period, the system owner shall pay a mitigation fee to the fire department of $500.00, plus the cost of fire engine response, as specified in the fire department's approved fee ordinance, for each occurrence. and the chief may, in addition, require the system owner to provide standby personnel as defined by Section 2501.18 or take such other measures, as the chief deems appropriate. Persons or activities required by the chief shall remain in place until a fire department approved fire alarm maintenance firm certifies in writing to the chief that

(90) Section 7902.2.2.1 is amended to add Sections 7902.2.2.1.1, 7902.2.2.1.2 and 7902.2.2.1.3 to read as follows:

7902.2.2.1 Locations where aboveground tanks are prohibited.

7902.2.2.1.1 Prohibited locations. No new aboveground tanks for the storage of Class I and Class II liquids (except LPG-Propane) outside of buildings shall be permitted on mercantile, residential, and other congested parcels. Existing tanks on such parcels shall be removed within one (1) year after written notice from the fire department.

7902.2.2.1.2 Other locations. New aboveground tanks for storage of Class I and II liquids on parcels not covered under Section 7902.2.2.1.1 shall be enclosed in a flammable liquid storage vault constructed in accordance with the standards of the fire department. Existing tanks on such parcels shall conform to this section within one (1) year after written notice from the fire department.

7902.2.2.1.3 Permits. In addition to any permits otherwise required by this code, all existing and new aboveground tanks for storage of Class I and II liquids shall comply with the permit requirements of any federal, state, or local agency regulating the storage of such liquids in the jurisdiction.

(91) Section 8207.1 is amended to read as follows:

8907.1 Seismic Valves. An approved seismic anchoring system shall be installed on all permanently installed, in use, propane/LPG gas containers. (See FSS Drawing No. 16).

Article V. Fire Safe Standards.

Division A. In General.

Sec. 13-21. Findings.

The board of supervisors makes the following findings pertaining to the conditions and requirements contained in this article:

(a) The conditions and requirements contained in this article are consistent with and in furtherance of the goals, objectives and policies of the public safety element of the general plan.

(b) The conditions and requirements contained in this article are necessary because the failure to adopt them would place residents and property within the unincorporated area of the county in a condition perilous to health or safety, or both.

(c) The conditions and requirements contained in this article are necessary to comply with the requirements of Public Resources Code section 4290.

(d) The conditions and requirements contained in this article are necessary because growth and development within the unincorporated area of the county has increased the potential for significant losses from wildland and structure fires and adversely impacted rural and wildland fire fighting resources.

(a) All development subject to the provisions of this article shall be constructed and maintained in compliance with the standards specified in this article. Approvals and permits for any development may be withheld or refused until adequate provision has been made to ensure such compliance.

(b) Exceptions to the standards specified in this article and mitigated practices may be allowed where the exception or mitigated practice provides the same overall practical effect as the specified standards.

(c) Application for an exception or mitigated practice shall be made in writing by an applicant for development or the applicant's authorized representative. The application shall state the specific section or sections of this article for which an exception or mitigated practice is proposed, material facts supporting the contention of the applicant, the details of the exception or mitigated practice proposed, and a map showing the proposed location and setting of the exception or mitigated practice. The burden of proving that a proposed exception or mitigated practice is warranted shall be on the applicant.

(d) The county fire chief shall determine whether to grant, deny, or modify any application for an exception or mitigated practice filed in connection with the issuance of any building permit. The planning commission, board of zoning adjustments, project review and advisory committee, or design review committee shall determine whether to grant, deny, or modify any application for an exception or mitigated practice filed in connection with any development approval under their respective jurisdictions. Modification of an application for an exception or mitigated practice by the county fire chief, planning commission, board of zoning adjustments, project review and advisory committee, or design review committee shall be limited to the alternate fire protection measures specified in Section 13-62.

(e) Where an application for an exception or mitigated practice is denied or modified, the applicant may appeal such denial or modification. Appeal from a denial or modification by the county fire chief shall be made pursuant to Article III of this chapter. Appeal from a denial or modification by the planning commission, board of zoning adjustments, project review and advisory committee, or design review committee shall be made pursuant to Chapter 25 or Chapter 26 of this code, as appropriate. In order to grant an appeal, the body hearing the appeal must find that the exception or mitigated practice proposed meets the intent of this article.

(f) A written copy of any decision granting an appeal within a state responsibility area shall be provided to the director of forestry and fire protection within ten (10) days after the decision is final.

Sec. 13-24. Scope of coverage.

(a) Except as otherwise provided in Section 13-25, the provisions of this article shall apply to all development on all lands within the unincorporated area of the county.

(b) Except as otherwise provided in this article, all applications for development approvals shall be accompanied by plans, engineering calculations, and other data necessary to determine compliance with the provisions of this article.

(c) Except as otherwise provided in this article, compliance with the provisions of this article shall occur prior to the commencement of construction of any structure unless otherwise authorized by the county fire chief.

Sec. 13-25. Exemptions.

appropriate. The county fire chief or the director of permit and resource management may authorize a local fire chief to conduct inspections within a local fire protection district under the direction of the county fire chief or the director of permit and resource management. In such cases, inspection results shall be provided to the county fire chief or the director of permit and resource management promptly after completion of the inspection.

Sec. 13-27. Distance measurements.

All distances specified or referenced in this article shall be measured horizontally unless otherwise stated.

Division B. Emergency Access.

Sec. 13-28. Intent.

This division establishes minimum emergency access requirements to provide safe access for emergency fire equipment and civilian evacuation concurrently, and to allow unobstructed traffic circulation during a wildfire emergency.

Sec. 13-29. Availability of emergency access.

All buildings shall be accessible to emergency fire equipment by a road or driveway constructed to within one hundred fifty (150) feet of any portion of an exterior wall of the first story of the building or such closer distance as the director of permit and resource management deems necessary to provide adequate access for emergency fire equipment. All buildings located on slopes of greater than five percent (5%) shall also include such additional fire protection measures under Section 13-63, as the county fire chief deems necessary to mitigate access constraints.

Sec. 13-30. Road and driveway surfaces.

All roads and driveways shall have all-weather driving surfaces. All structural sections shall be constructed so as to meet or exceed the following standards:

(a) On level areas and grades of less than five percent (5%), roads and driveways shall have a gravel surface. The structural section of the road or driveway shall be at least one foot (1') of compacted Class 2 Aggregate Base.

(b) On grades of between five percent (5%) and ten percent (10%), roads and driveways shall have a double seal coat surface. The structural section of the road or driveway shall have an armor coat surface, constructed according to CalTrans Standard Specifications Section 37, Bituminous Seal Double Application, and the base portion of the road or driveway shall be at least one foot (1') of compacted Class 2 Aggregate Base.

(c) On grades of greater than ten percent (10%), roads and driveways shall have an asphalt concrete surface. The structural section of the road or driveway shall be asphalt concrete of at least two tenths of one foot (0.2') thick. The base portion of the structural section shall be at least five tenths of one foot (0.5') of compacted Class 2 Aggregate Base.

(d) In lieu of the prescriptive structural sections required by subsections (a), (b) and (c), a design of the section may be prepared by a licensed civil engineer using a soils investigation that provides soil R-value and expansion index. Alternatively, the engineer may

(c) Where a private road, with a throat width measuring equal to or greater than twelve feet (12') and less than eighteen feet (18') or a driveway with a throat width equal to or greater than ten feet (10') as measured thirty feet (30') from the edge of pavement, intersects a public or private road, the edge of pavement radius shall begin with a line a minimum of twelve feet (12') from and parallel to the physical centerline of the public or private road and a minimum radius of thirty-five feet (35') shall be provided from this point to the point of tangency with the edge of pavement of the private road or driveway. A taper of not less than ten-to-one (10:1) shall be provided along the public or private road when the public or private road is less than twenty-four feet (24') wide. In lieu of a ten-to-one (10:1) taper connecting private road or driveway to private road only, a radius of forty feet (40') may be used.

(d) Where a driveway, with a throat width measuring equal to or greater than ten feet (10') and less than eighteen feet (18') as measured thirty feet (30') from the edge of pavement, intersects a private road, the edge of pavement shall be a minimum radius of forty feet (40'). Any driveway with a throat width greater than eighteen feet (18'), as measured thirty feet (30') from the edge of the pavement, that intersects a private road, shall comply with the private road/public road requirements set forth in subsection (b) of this section.

Sec. 13-33. Roadway and driveway structures (bridges).

(a) All roadway and driveway structures shall be designed, constructed, and maintained in accordance with applicable sections of the county building code, the Standard Specifications for Highway Bridges, and any administrative regulations adopted pursuant to Section 13-2, and shall have a minimum designed live-load capacity of HS 20. All roadway and driveway structures shall be constructed pursuant to a valid building permit. All roadway and driveway structures shall be inspected according to the administrative and inspection provisions of the county building code.

(b) All roadway and driveway structures shall have appropriate signing identifying structure capability, including weight and vertical clearance limits, and any one-way road or single traffic lane conditions.

(c) All roadway bridges having only one traffic lane shall be constructed to provide a minimum unobstructed width of twelve feet (12'), shall provide for unobstructed visibility from one end to the other and shall have turnouts at both ends.

(d) All driveway structures shall be constructed to provide a minimum of one (1) ten foot (10') traffic lane and an unobstructed vertical clearance of fifteen feet (15') along the entire length of the driveway structure. Any driveway structure with a minimum unobstructed width of ten feet (10') shall not exceed sixty-five (65') in length.

(e) Any road or driveway structure required to have a turnaround may have either a hammerhead/T, a stub out, or terminus bulb. All turnarounds shall have a minimum turning radius of forty feet (bulbs shall be forty feet (40') from the center point of the bulb, hammerhead/T and stub out shall have entry and exit curves of no less than a forty foot (40') radius. If a hammerhead/T is used, the top of the "T" shall be a minimum of sixty feet (60') in length. If a stub is used, then the length of the turnaround shall be forty feet (40'), as measured from the roadway or driveway edge. The minimum width of either a hammerhead/T or a stub out shall be equivalent to the roadway or driveway entering the turnaround.

(f) Any road or driveway structure required to have a turnout, shall have a turnout that is a minimum of twenty feet (20') wide, including the roadway and the turnout, and thirty

Sec. 13-36. Dead-end roads.

In addition to meeting the applicable standards in the preceding sections, all dead-end roads shall comply with the following requirements:

(a) All dead-end roads shall have a maximum length, including any dead-end roads accessed from the original dead-end road, not exceeding the following cumulative lengths regardless of the number of parcels served:

(1) Parcels zoned for less than one (1) acre - eight hundred feet (800');

(2) Parcels zoned for one (1) acre to 4.99 acres - one thousand three hundred twenty feet (1320');

(3) Parcels zoned for five (5) acres to 19.99 acres - two thousand six hundred forty feet (2640'); and

(4) Parcels zoned for twenty (20) acres or larger - five thousand two hundred eighty feet (5280').

All lengths shall be measured from the edge of the roadway at the intersection that begins the dead-end road to the farthest point on the dead-end road. Where a dead-end road crosses areas of differently zoned parcels, requiring different length limits, the average size of the parcels served shall determine the maximum allowable length of the road.

(b) All dead-end roads serving parcels five (5) acres or larger shall have turnarounds constructed approximately every one thousand three hundred twenty feet (1320') along the entire length of the road.

(c) All dead-end roads shall have a turnaround constructed at the terminus of the road. Any road or driveway structure required to have a turnaround may have either a hammerhead/T, a stub out, or terminus bulb. All turnarounds shall have a minimum turning radius of forty feet (bulbs shall be forty feet (40') from the center point of the bulb, hammerhead/T and stub out shall have entry and exit curves of no less than a forty foot (40') radius. If a hammerhead/T is used, the top-of the "T" shall be a minimum of sixty feet (60') in length. If a stub is used, then the length of the turnaround shall be forty feet (40'), as measured from the roadway or driveway edge. The minimum width of either a hammerhead/T or a stub out shall be equivalent to the roadway or driveway entering the turnaround.

Sec. 13-37. Driveways.

In addition to meeting the applicable standards in the preceding sections, all driveways shall comply with the following requirements:

(a) All driveways shall be constructed to provide a minimum of one (1) ten foot (10') traffic lane and an unobstructed vertical clearance of fifteen feet (15') along the entire length of the driveway.

(b) All driveways exceeding one hundred fifty feet (150') in length shall have a turnout constructed at approximately the midpoint of the driveway. Any driveway exceeding eight hundred feet (800') in length shall have turnouts constructed approximately every four hundred feet (400') along the entire length of the driveway.

(c) All driveways exceeding one hundred fifty feet (150') in length shall have a turnaround constructed at each residential building served by the driveway.

(4) Road names shall not duplicate or cause confusion with existing road names. Road names shall be deemed to be duplicates if they have different suffixes, but are otherwise the same.

(5) Road names that are numbers or letters shall be avoided.

(6) Road names that are geographically misleading shall be avoided.

(7) Road names that are inappropriate or offensive shall be prohibited.

(8) A road having a continuous alignment shall bear the same name.

(9) Road extensions shall bear the same name as the existing road.

(10) Roads or portions of roads to be connected in the future into a continuous alignment shall bear the same name.

(11) Roads intersecting one another, or forming a deflection angle of greater than ninety (90) degrees shall generally have different names.

(12) A cul-de-sac road may bear the same name as the road it intersects, provided that the suffix is court or place.

(13) No road shall be named such that it will intersect itself or create an intersection with a road having a duplicate name.

(14) Any other standards established by resolution or ordinance of the board of supervisors.

Sec. 13-41. Size of letters, numbers and symbols for road signs.

All letters, numbers and symbols designating names on road signs shall be according to county road standards.

Sec. 13-42. Visibility and legibility of road signs.

All road signs shall be visible and legible from both directions of vehicle travel for a distance of at least one hundred feet (100'). All road signs shall indicate the road name and whether the road is public or private in each direction of vehicle travel in conformance with county road standards.

Sec. 13-43. Orientation and height of road signs.

All road signs shall have an orientation and height in conformance with county road standards.

Sec. 13-47. Size of letters, numbers and symbols for addresses.

All letters, numbers and symbols designating a residential building address shall be a minimum four inch (4") letter height, three-eighths inch (3/8") stroke, reflective, contrasting with the background color of the sign. All letters, numbers and symbols designating a commercial building address shall be a minimum six inch (6") letter height, half-inch (½") stroke, reflective, contrasting with the background color of the sign.

Sec. 13-48. Installation, location and visibility of addresses.

(a) All buildings shall have a permanently posted address, which shall be placed on building and shall be plainly visible and legible from the road on which the address is located or the primary driveway. The numbers shall contrast with their background.

(b) All buildings shall have a permanently posted address, which shall be placed at each driveway entrance and shall be visible and legible from both directions of travel along the road on which the address is located.

Exception: An approved internally lighted building address device may be used when such building address device is located on the building and the building is located within thirty feet (30' of the edge of the road on which the address is located.

(c) All address signs along one-way roads shall be visible from both the intended direction of travel and the opposite direction.

(d) Where multiple addresses are required at a single driveway, such addresses shall be mounted on a single approved post.

(e) Where a road provides access solely to a commercial building, the address sign shall be placed at the nearest road intersection providing access to the site.

Division D. Emergency Water Supply.

Sec. 13-50. Intent.

This division establishes minimum emergency water supply requirements to ensure a supply of water to attack a fire or defend property from a fire.

Sec. 13-51. Emergency water supply.

(a) All buildings shall have a permanent emergency water supply approved by the county fire chief, which shall be installed, maintained and available for use as follows:

(1) Except as otherwise provided in subsection (a)(3), where water is provided by a public water system, the permanent emergency water supply shall be installed and available for use prior to the completion of road construction:

adopted June 12, 1956 (corrected September 7, 1983, Decision 83-09-001), Section VIII Fire Protection Standards and other applicable sections relating to fire protection water delivery systems or the minimums for static water systems equaling or exceeding the National Fire Protection Association Standard 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting.

(c) All hydrants for non-urban parcels shall comply with the following requirements:

(1) Hydrant outlets shall be a minimum of eighteen inches (18") and a maximum of twenty-four inches (24") above grade, eight feet (8') from flammable vegetation, no closer than six feet (6') nor farther than twelve feet (12') from the edge of the road or driveway, and in a location where emergency fire equipment using it will not block the roadway. The hydrant serving any residential building shall be located at a turnout or turnaround, along the driveway to the building, or along the road that intersects with the driveway. The hydrant serving any residential building shall be connected to the emergency water supply by an approved minimum four inch (4") diameter water line.

(2) All hydrants shall be located between sixty feet (60') and one-hundred fifty feet (150') from the residential building. The fire hydrant shall be installed so that a fire engine utilizing the hydrant may maintain a minimum distance of sixty feet (60') from the residential building. Distance measurements shall be determined by hose lay along a road or driveway, not horizontal distance.

EXCEPTIONS:

1. The distance to the hydrant, on a non-urban parcel with exclusively residential buildings on it, may exceed one hundred fifty feet (150') by one hundred fifty feet (150') for each additional five hundred (500) gallons of water storage capacity up to a maximum of two thousand five hundred and fifty feet (2550') from the residential building as allowed by Table 13-52a.

2. A public fire hydrant can be used for the emergency water supply as allowed by Table 13-52b, for non-urban parcels with exclusively residential buildings on them.

(d) All hydrants shall have at least one (1) two and one-half inch (2½") outlet with male National Hose Threads and a cap. On water systems of greater than ten thousand five hundred (10,500) gallons, there shall also be at least one (1) four and one-half inch (4½") outlet with male National Hose Threads and a four and one half inch (4 ½") by two and one half inch (2 ½") reducer with a cap.

(e) All hydrants shall be a wet barrel hydrant or a draft hydrant as required by the delivery system and shall have suitable crash protection. The maximum height differential between the water source and the draft hydrant outlet shall be 10 feet. Draft hydrants shall be supplied by six inch (6") minimum pipe size, and be equipped with a four and one-half inch (41/2") National Hose male thread fitting with a cap.

(a) If located along a driveway, a reflective blue marker, with a minimum dimension of three inches (3"), shall be located on the driveway address sign and mounted on a fire retardant post; or

(b) If located along a road either of the following are acceptable:

(1) A reflective blue marker, with a minimum dimension of three inches (3"), shall be mounted on a fire retardant post. The sign post shall be within three feet (3') of the hydrant, with the sign no less than three feet (3') nor greater than five feet (5') above ground, aimed toward headlights, in a horizontal position and visible from the driveway, or

(2) As specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

Division E. Fuel Modification.

Sec. 13-54. Intent.

This division establishes minimum fuel modification requirements to reduce the possibility and intensity of a wildfire, to provide increased safety for emergency fire equipment, personnel and evacuating civilians, and to provide a point of attack against or defense from a wildfire.

Sec. 13-55. Setback for building defensible space.

(a) On parcels less than one (1) acre, all buildings shall have a setback from any property line or the centerline of any road of not less than the applicable minimum setbacks specified in Chapter 26 of the county building code.

(b) On parcels one (1) acre or larger all buildings and accessory buildings shall have setbacks to the property line and/or exterior wall protection according to Table 13-55.

EXCEPTION: Commercial building and R-1 occupancy residential building setbacks in local responsibility areas shall be according to Section 503 of the county building code.

TABLE 13-55
SETBACKS AND EXTERIOR WALL PROTECTION REQUIREMENTS[1]

Location[2]	Fire Resistance of Exterior Walls[3]	Openings in Exterior Walls[4]
Less than 10'	1 hour construction	Not Allowed

Any development which designates a facility or land use as a greenbelt shall locate the greenbelt strategically, as a separation between wildland fuels and buildings. The director of permit and resource management shall approve the location of any greenbelt.

Sec. 13-59.5 Vegetation management plans.

A vegetation management plan shall be required for any new residential or commercial building within a state responsibility area. The plan shall be prepared by a qualified professional and shall be approved by the county fire chief. The plan shall include, at a minimum, defensible space zones, identification of vegetation types, replacement of non-native flammable vegetation with approved fire resistive vegetation, and a maintenance program for all vegetation. The property owner shall record a covenant, in a form satisfactory to county counsel, which ensures that the approved plan will be implemented and maintained.

Sec. 13-60. Roofing.

All structures regulated by the county building code shall have roof coverings that comply with the requirements of Chapter 7 of this code.

Division F. Other Fire Protection Measures.

Sec. 13-61. Intent.

This division establishes alternate fire protection measures for use in place of standards specified in this article which cannot be met and additional fire protection measures to mitigate parcel specific fire protection problems.

Sec. 13-62. Alternate fire protection measures.

When authorized pursuant to Section 13-23, any of the following alternate fire protection measures may be used as exceptions to the standards specified in this article or as mitigated practices:

(a) Increased emergency water supply requirements;

(b) Installation of a sprinkler system that meets the requirements of the National Fire Protection Association and includes protection of eaves;

(c) Increased flammable vegetation clearance areas for buildings;

(d) Increased flammable vegetation clearance areas for roads and driveways;

(e) Use of fire resistive vegetation;

(f) Installation of fire resistive exterior siding;

(1) Any of the fire protection measures specified in subsection (a);

(2) Construction of additional turnouts and turnarounds;

(3) Provision of a secondary means of ingress and egress to the parcel;

(4) Vegetation management plan.

(c) Where features of topography or terrain create conditions on a parcel which the county fire chief determines warrant additional fire protection measures, the county fire chief may consider the parcel to be an area of high or very high fire hazard severity and require any of the fire protection measures specified in subsection (b) in addition to the other standards specified in this article.

Article VI. Fireworks.

Sec. 13-66. Sale, use or discharge of fireworks prohibited - Exception.

(a) Except for public displays of fireworks authorized pursuant to this section, it is unlawful for any person to possess, store, offer or expose for sale, sell at retail, give away or in any manner dispose of any fireworks, or to use, explode, or otherwise discharge any fireworks within the unincorporated area of the county.

(b) Any person or group desiring to perform a public display of fireworks within the unincorporated area of the county shall first make written application for a permit to the local fire chief, if the display is to be held within a local fire protection district, or the county fire chief, if the display is to be held within a portion of the unincorporated area of the county not in a local fire protection district. Application for a permit shall be made in writing at least twenty (20) days prior to the proposed display. The application shall be considered and acted upon by the local fire chief or county fire chief, as appropriate, pursuant to Title 19 of the California Code of Regulations. Any permit for a public display of fireworks may be suspended or revoked at any time by the local fire chief or the county fire chief, as appropriate.

Article VII. Open Burning.

Sec. 13-71. Burning permits required.

It is unlawful for any person to undertake or authorize the undertaking of any open burning within the unincorporated area of the county at any time between May 1st and the date the director of forestry and fire protection declares, by proclamation, that the hazardous fire conditions have abated for that year or at any other time when the director of forestry and fire protection has declared, by proclamation, that unusual fire hazard conditions exist within the region wherein the county is located without first obtaining a written burning permit as follows:

Sec. 13-76. Burning to be under supervision of responsible person.

All burning for which a permit is required pursuant to this article shall be done under the direction and constant surveillance of a responsible person.

Article VIII. Fees and Charges.

Sec. 13-81. Schedule of fees and charges.

(a) The board of supervisors may from time to time establish a schedule of fees and charges following the procedure set forth in California law (currently Government Code Section 66016 et seq.) to recover the reasonable cost of providing services, issuing permits and enforcing regulations pursuant to this chapter.

(b) The board of directors of any fire protection district may from time to time establish a schedule of fees and charges following the procedure set forth in California law (currently Health and Safety Code Section 13916) to recover the reasonable cost of providing services, issuing permits and enforcing regulations pursuant to this chapter. Pursuant to Health and Safety Code Section 13916, no such fee or charge on new construction or development shall be for construction of public improvements or facilities or the acquisition of equipment.

Article IX. Enforcement.

Sec. 13-86. Responsibility for enforcement.

Except as otherwise provided herein, the county fire chief shall be responsible for enforcing the provisions of this chapter.

Sec. 13-87. Issuance of citations.

The county fire chief, director of permit and resource management, and local fire chiefs may, pursuant to Section 836.5 of the Penal Code, arrest a person without a warrant whenever they have reasonable cause to believe that the person to be arrested has committed a misdemeanor in their presence which is a violation of this chapter or any other ordinance or statute which they have a duty to enforce, and to issue a written notice to appear and to release such person on his or her written promise to appear in court, as prescribed by Chapter 5C (commencing with section 853.6) of the Penal Code.

Article X. Violations.

Sec. 13-91. Violation - Penalty.

Any person who violates or fails to comply with any provision of the Uniform Fire Code, the Uniform Fire Code Standards, or the National Fire Codes, as adopted, or this chapter, or who violates or fails to comply with any order or regulation made thereunder, or who acts in violation

availability create a terrain which causes access problems and other problems for emergency fire equipment and personnel.

The grassland areas in the county have easily ignitable fuels which are subject to high winds. A southern exposure and unbroken fuel create a potential for major conflagrations.

The county has potentially active seismic hazards within its boundaries (the San Andreas Fault and several other fault traces have been identified within the county). Large portions of the county are within the Alquist-Priolo Special Studies Zones. While systems have been developed to study and monitor the activity of earthquakes, science has not yet been able to predict (with reliability) the potential for activity on active faults. Seismic activity within the county occurs yearly with little or no damage although the very real potential for damage exists with the active faults within the county. While new construction may be limited by their respective distances to faults, existing structures and replacement of these structures present a serious problem.

The mixture of developed and undeveloped areas within the county creates hazardous conditions when a storm of "gale-force winds" causes trees to fall onto roadways used for access by emergency fire equipment and personnel. In addition, flooding occurs in certain areas of the county during heavy winter storms limiting or eliminating access for emergency fire equipment and personnel.

Landslides have been experienced in various areas of the county. While stabilization can sometimes be provided, heavy winter storms cause failures. These failures have closed roadways within the county making access for emergency fire equipment and personnel impossible until properly cleared.

3. Sonoma County has topographical conditions which are closely associated with the geological and geographic characteristics noted above. The topographical conditions are the result of the design and construction of development within the county based on elevation changes in the county as well as the hills, canyons, lakes and streams which exist in the county.

The sources of water within the county are directly affected by its topographical layout. The water sources consist of on-site water storage tanks, lakes, pools, wells, mutual water systems, and the Sonoma County Water Agency distribution network. Water supplies within the county vary from less than ten (10) gallons per minute to flows in excess of four thousand (4,000) gallons per minute. This wide variation causes major problems to development as well as fire suppression forces.

The roadway system through most of the county is designed around the topographical lay of the land and consists in many cases of narrow, winding roads, steep grades, and overhanging tree branches. The grades on roadway surfaces sometimes exceed 25% and widths of less than twelve (12) feet are not uncommon.

The topographical conditions also make construction more restricted to the level and semi-level portions of the county, with high concentrations of building within these areas.

SUPERVISORS:

BROWN Aye KERNS Aye SMITH Aye REILLY No KELLEY No

AYES 3 NOES 2 ABSTAIN ____ ABSENT

WHEREUPON, the Chair declared the above and foregoing ordinance duly adopted and

SO ORDERED.

Mike Kerns

Chair, Board of Supervisors
County of Sonoma

ATTEST:

EEVE T. LEWIS, County Clerk and
ex-officio Clerk of the Board of
Supervisors

CHAPTER 7

BUILDING REGULATIONS*

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*Prior history: Ord. Nos. 2679, 2770, 3106, 3180, 3497, 3834, 3935, 4103, 4123, 4185, 4401, 4445, 4467, 4533, 4560, 4618, 4664, 4746, 4751, 4770 and 4862.

Article I. General.

Sec. 7-1. Purpose.

This chapter is enacted as a result of requirements of state law and the determination that within the unincorporated area of this county, certain regulations for construction, maintenance, use and occupancy are required to provide the minimum standards to safeguard the life, limb and property and protect the public health, safety and general welfare and to provide regulations and control of those factors in man's physical environment which exercise or may exercise a deleterious effect on his physical development, health and survival. The board of supervisors of the county of Sonoma has determined that the adoption of this chapter will assure local control of the mandatory building and inspection requirements of the state of California.

There is established in this county the permit and resource management department. The board of supervisors shall budget and appropriate such funds for the department as it may deem necessary for the operation of said department. (Ord. No. 4906 § 3, 1995.)

Sec. 7-2. Chief building official and duties.

There is established the office of chief building official. The chief building official shall be the director of the permit and resource management department or his or her designee. The chief building official shall supervise and be responsible for all inspection work required for the proper enforcement of regulations imposed by this chapter except those duties specifically delegated herein to the county public health officer. The chief building official shall perform related duties as directed by the board of supervisors. The chief building official shall appoint such deputies and assistants as may be authorized by the board of supervisors.

The chief building official or his or her duly authorized representative shall act as the secretary of the board of building appeals and, notwithstanding any provisions in any code adopted hereby to the contrary, he or she shall not be a member thereof. Upon presentation of proper credentials and pursuant to the law, the chief building official or his or her duly authorized representative may enter buildings, structures, or premises in the unincorporated area of the county to perform any duty imposed upon him or her by this chapter. (Ord. No. 5399 § 1, 2003: Ord. No. 4906 § 3, 1995.)

Sec. 7-3. Board of building appeals.

There is created the board of building appeals, consisting of seven (7) members appointed by the board of supervisors. The term of office of each shall be four (4) years or until his or her successor is appointed and qualified. Vacancies other than upon the conclusion of a term shall be filled for the remainder of the predecessor's term. Members shall be qualified by experience and training to rule upon matters pertaining to building code interpretation, fire code interpretation, and suitability of alternate materials and types of construction. It shall be the policy of the board of supervisors to appoint as members at least one (1) registered civil engineer, one (1) registered fire protection engineer, one (1) licensed architect, and one (1) contractor with at least a Class B license, but this policy shall in no way deprive the board of supervisors of its full discretion in the appointment of otherwise qualified persons. Each member shall receive twenty-five dollars ($25.00) for each meeting attended but not to exceed fifty dollars ($50.00) in any one (1) calendar month. The board of building appeals shall by resolution fix regular times and places for its meetings. Except where inconsistent with the provisions of this section, Section 7-4, Section 13-11 or Section 13-12 of this code, the duties of the board of building appeals shall be as prescribed in Section 105 of the California Building Code, Section 205 of the Uniform Building Code for the Abatement of Dangerous Buildings, Section 203 of the Uniform Housing Code, Section 203(a) of the Uniform Administrative Code provisions for the National Electrical Code and Section 110 of the California Mechanical Code. (Ord. No. 5167 § 1(a), 1999: Ord. No. 4906 § 3, 1995.)

Sec. 7-4. Appeals.

Appeal may be made by any applicant or owner of property contiguous to the property to be regulated. For purposes of determining continuity, property lines shall be projected to the center of public streets or highways. Said appeal may be made from any decision of the chief building official provided, however, that such appeal may not be made more than thirty (30) days after the decision from which appeal is being made has been rendered. All applicants and appellants shall be given

reasonable opportunity to be heard and present evidence. Decisions of the board of appeals shall be in writing and shall be delivered to the appellant either in person or by mailing to the address stated on the appeal or application. Decisions of the board of building appeals are final. Should no decision be rendered within twenty (20) days after hearing of the appeal, said appeal is denied unless time is extended by action of the board of building appeals. (Ord. No. 4906 § 3, 1995.)

Sec. 7-5. Building permit required.

(a) No person, firm or corporation shall erect, construct, enlarge, alter, repair, move, improve, convert or demolish any building or structure in the unincorporated area of this county, or cause the same to be done, without first obtaining

a separate building permit for each such building or structure as required by this chapter. Permits shall be issued and fees shall be collected by the permit and resource management department. A single permit may be issued for a dwelling and one accessory building of one story conventional light frame wood construction, not exceeding six hundred (600) square feet in area, and on the same property.

(b) Permits shall not be issued by the permit and resource management department for work which includes any of the following, unless and until written approval has been received:

(1) The construction, alteration or modification of:

(i) Any on-site disposal system (approval required from the well and septic section of permit and resource management department),

(ii) Any water supply system which under state law or county ordinance is required to have a permit to operate (approval required from the health officer or the State Health Services Department),

(iii) Any establishment selling or preparing food or food products, any public or semi-public swimming pool as defined in the California Administrative Code (approval required from the health officer);

(2) The construction, alteration or modification of any structure which will result in the structure being connected to an on-site disposal system or water system;

(3) The alteration or modification of any existing structure which is connected to an on-site disposal system or water system requiring a permit, where the alteration or modification may impose additional burdens upon the existing system, such as, but not limited to, the addition of rooms or the modification of floor plans for potential additional occupancy. This section shall not apply to repairs, such as replacement of roofing or siding. Where the permit is for modification or alteration of an existing structure, no permit will be issued where, in the determination of the director of the permit and resource management department, such modification is likely to result in exceeding the capacity of the system;

(4) The construction, alteration or modification of any structure which may result in the property being improved in excess of its capacity to absorb sewage effluent. This section is intended to cover any change in the property which might adversely affect sewage disposal such as, but not limited to grading, the construction of a barn or swimming pool which might infringe on the leach field.

Whenever approval of the on-site disposal system is required, it shall be based upon the requirements imposed by this chapter and any other state or local law or regulation which may be applicable, including basin plans and other standards promulgated by the North Coast Water Quality Control Board and the San Francisco Bay Regional Water Quality Control Board.

(c) Building and grading permits must be cleared as to zoning considerations in Chapter 26 and drainage, flood control and stormwater requirements in Chapter 11. Building permits for projects regulated by the California Fire Code and Sonoma County fire safe standards may be subject to review and approval by appropriate fire service agencies. Where county road encroachment is necessary, a permit for same shall be first secured. A water and/or sewer clearance is first required in areas serviced by special districts and cities before building permits can be issued.

(d) Notwithstanding any other provision of this chapter or the codes adopted hereby, emergency maintenance work or repair of buildings and structures requiring a permit hereunder may be commenced before obtaining a permit without violating this chapter provided the permit and resource management department or the public health officer, in the appropriate case, is notified prior to noon of the next following business day and the permit required is obtained within twenty-four (24) hours thereafter, and provided further that no work shall be covered before it has been duly inspected and approved. Compliance with the State Subdivision Map Act, the Sonoma County subdivision regulations, and the Sonoma County zoning regulations, including compliance with conditional permits issued thereunder, and compliance with all laws, is a condition precedent to the issuance of any permit required by this chapter for work to be done on any particular parcel of real property in the unincorporated area of this county.

(e) As a condition precedent to the issuance of a building permit required by this section for which an application was made on or after November, 1989, the applicant shall pay to the county a countywide traffic mitigation fee for the purpose of offsetting the road infrastructure costs caused by the cumulative effect of development in the county. The amount of the fee shall be adopted by the board of supervisors in accordance with the procedures set forth in Government Code Section 65962. The permit required for Section 106 of the California Building Code for structures subject to the requirements of this subsection shall not be issued unless and until the traffic mitigation fee has been paid.

(f) Within flood-prone urban areas as defined in Section 7-13(a)(10), a building permit authorizing excavation for foundations shall not be issued until a disposal location for excavated material has been designated. Acquisition of a

building permit does not relieve the permittee of the responsibility for acquiring any other state and local permits required for the activity.

(g) In any unincorporated portion of Sonoma County where stormwater discharges are subject to the requirements of one or more NPDES permits, as referenced in Chapter 11, any construction site for which building permits are approved pursuant to Chapter 7 must be developed and used pursuant to any applicable requirements of said NPDES permit(s). Failure to adhere to applicable NPDES permit requirements at any time will be deemed to be a violation of this section and may subject the permittee to the penalties established by this chapter. Permittees may meet this requirement by filing with the Regional Water Quality Control Board the appropriate notice of intent to comply with the state general construction activity stormwater permit or by obtaining approval of an individual NPDES permit from the Regional Water Quality Control Board. (Ord. No. 5167 §§ 1(b), 1(c), 1999; Ord. 4981 §§ 1, 2, 1996; Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-6. Relocated buildings.

A relocated building shall comply with the provisions of this chapter for new buildings to the extent that is reasonable and practical as determined by the chief building official. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-7. Exemptions.

(a) At the applicant's option, the provisions of Section 7-5 requiring building permits may be exempted for buildings designed and constructed for use in housing farm machinery, animals, supplies or products that are harvested from or utilized on a parcel of land. Buildings constructed pursuant to this section shall, except for the exemption from permit, conform to all applicable codes and regulations. This exemption shall not apply to the following:

(1) Any building, any part of which is within sixty (60) feet of a property line or other non-agricultural exempt building, regardless of the size of the parcel, except the distance to other buildings may be reduced to not less than (40) feet when allowed by building code requirements;

(2) Any building which will contain waste plumbing. Electrical, mechanical and water systems may be installed in agricultural exempt buildings, however, permits for and inspections of these systems are required;

(3) Any farm property less than five (5) acres. Farm property means all contiguous parcels. Parcels shall be considered as contiguous even if they are separated by roads;

(4) Any building that is not an agricultural building as defined by Section 202-A of the Uniform Building Code;

(5) Any building located on property with a land use zone other than LIA, LEA, DA RRD, RRDWA, AR TP or RR;

(6) Property on which an agricultural use does not presently exist and for which no substantial evidence of future agricultural use is available. The chief building official's determination of the sufficiency of the evidence of current or future agricultural use shall be final;

(7) Any building exceeding (2) stories;

(8) Any building constructed primarily of other than wood frame construction except for manufactured pre-engineered buildings;

(9) Any wood frame building wherein spans of structural members exceed twenty-five (25) feet, unless the exemption request is accompanied by building plans prepared, stamped, and signed by a licensed civil or structural engineer or architect.

(b) Prior to the erection, construction, conversion, enlargement or major alteration of any building or structure situated on agricultural land, or prior to the moving of any building or structure onto said land subject to exemption, a written application for the exemption shall be filed with the chief building official and shall contain:

(1) A verified statement in writing signed by the owner of the agricultural land regarding each of the requirements contained in Section 7-7;

(2) Description of the present use of the land;

(3) Description of the building or structure to be exempted and its proposed use;

(4) Name and address of the owner of the land and the assessor's parcel number. The applicant must be the owner;

(5) An accurate dimensioned plot plan showing all buildings, structures, property lines, streets and roads and the means of access thereto;

(6) Such further information as the chief building official may require;

(7) Payment of the exemption fee.

(c) The chief building official shall record a notice of agricultural exemption with the county recorder following issuance of an agricultural exemption. The notice shall contain:

(1) The owner's name and the property address and assessor's parcel number;

(2) The owner's description of the present agricultural use of the land;

(3) A description, including use, of the building for which the exemption was issued;

(4) The date of exemption issuance. (Ord. No. 5167 §§ 1(d), 1(e), 1999; Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-8. Inspection by county public health officer and the director of permit and resource management department.

The county public health officer or his duly authorized representative shall inspect all premises subject to operating regulations pursuant to this chapter at such time or times as he deems necessary, and if he determines that a violation of the regulations imposed by this chapter has occurred or is occurring, which is endangering or may endanger the public health, he may serve a notice of violation upon the permittee under an operating permit in such manner as provided herein or in codes adopted hereby. A copy of said notice shall be delivered to the permit and resource management department or the board of building appeals unless such disposition is approved in writing by the public health officer. The public health officer or his duly appointed representative may enter, during reasonable times, and in accordance with law, upon buildings, structures or premises within the unincorporated area of this county to perform any duty imposed upon him by this chapter.

Whenever a property owner requests a certificate from the director of permit and resource management department, certifying that the premises comply with all existing laws and regulations enforced by the director of permit and resource management department respecting sewage disposal systems and water supply, a fee shall be charged as set by ordinance of the board of supervisors. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-9. Refunds.

Refunds of permit fees paid pursuant to this chapter shall be made as specified in Section 107.6 of the California Building Code, Sections 103.4.5, 103.4.5.1, 103.4.5.2 and 103.4.5.3 of the California Plumbing Code, Sections 115.6, 115.6.1, 115.6.2, and 115.6.3 of the California Mechanical Code and Section 304 of the Uniform Administrative Code Provisions for the National Electric Code. (Ord. No. 5167 § 1(f), 1999: Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-10. Valuation and fees.

Notwithstanding the fees set forth in the codes adopted by this chapter, the board of supervisors shall by ordinance set the valuations of structures and set all fees to be collected. Building valuation data published periodically by the International Conference of Building Officials may be used as a guide. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-11. Conflicting regulations.

Wherever conflicting provisions or requirements occur between this code, the technical codes and any other codes or laws, the most restrictive shall govern, provided however:

(a) In conflicts where sanitation, life safety or fire safety are involved, the provisions providing the greatest safety to life shall govern; and

(b) Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall be applicable. (Ord. No. 5167 § 1(g), 1999: Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-11.5. Compliance with fire safe standards.

Any building or structure subject to the provisions of this chapter shall comply with the fire safe standards set forth in Chapter 13 of this code. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-11.75. Compliance with right to farm ordinance.

Any building or structure subject to the provisions of this chapter shall comply with the right to farm ordinance set forth in Chapter 30 of this code. (Ord. No. 5023 § 1, 1999.)

Sec. 7-12. Building permits in water scarce areas.

No building permit for new or replacement residential dwelling units shall be issued within the water scarce area four (4) as shown on that certain map entitled "Ground Water Availability" shown as Figures RC-2a to RC-2i of the Sonoma County general plan where the water supply is from individual wells, springs or any other sources, unless the following requirements are met:

(a) That the well or wells yield a minimum of one (1) gallon per minute per dwelling unit by a sustained yield, metered pump test of the following duration:

(1) Single-family dwelling (one (1) connection): test of four (4) hours after the stabilized rate has been established,

(2) Two (2) to four (4) connections: test of at least eight (8) hours after the stabilized rate has been established,

(3) Five (5) or more connections: test of at least seventy-two (72) hours after the stabilized rate has been established. A reduction of the seventy-two (72) hour metered pumping test may be granted by the administrative authority, if it is indicated that the sustained yield well production is two (2) or more times greater than required. Under no circumstances shall the test be less than eight (8) hours;

NOTE: Determination of sustained yield shall include a constant rate of water discharge from the well during the pump test and a continuation of the pump test until at least four (4) consecutive measurements of water level drawdown in the well and the elapsed time since the beginning of the pump test yield a straight line when the drawdown is plotted against the logarithm of the elapsed time. (Section 64563 — Title 22 California Administrative Code), or by an equal method approved by the administrative authority.

(b) That a minimum storage capacity shall be provided as follows:

(1) Single-family dwelling (one (1) connection) — one thousand (1,000) gallons shall be provided either in the well hole or in a storage tank, or both; provided, however, that only five hundred (500) gallon storage shall be required if the yield is three (3) gallons per minute; provided further, however, that no storage is required if the well yield is five (5) gallons per minute, or greater,

(2) Two (2) or more connections — one thousand (1,000) gallons shall be provided per connection, either in the well hole or in a storage tank, or both, as required by the county of Sonoma water system standards, whichever is greater,

(3) Note: These volumes are for domestic water storage. Additional storage volume is required for fire control;

(c) The tests shall be conducted from July 15th to October 1st. The test period may be extended by the project review and advisory committee. Tests to determine the yield shall be performed by a licensed drilling or pumping contractor or a registered civil engineer, who shall report test results to the director of permit and resource management department. The director of permit and resource management department shall be notified a minimum of twenty-four (24) hours prior to the pump testing of wells or springs serving two (2) or more connections;

(d) That, if spring(s) or other water sources are to be used as the primary domestic water source, yields and required storage capacity shall meet the same minimum requirements as for wells. Springs shall be perennial;

(e) Application may be made to the project and review advisory committee for approval of alternate methods of water supply. (Ord. No. 5167 § 1(h), 1999: Ord. No. 4906 § 3 (part), 1995.)

Article II. Rules and Regulations.

Sec. 7-13. Codes adopted and modifications.

Pursuant to Section 50022.2 of the Government Code, the following codes are adopted in this chapter as defined and modified herein.

(a) California Building Code Volumes 1 and 2, Chapters 1-35, Appendix Chapter 3 Division II, Chapter 4 Division II Chapter 15, Chapter 29, Chapter 31 Divisions II and III, and Chapter 33, but excepting Section 3306.2.1, are hereby adopted and incorporated herein by reference, save and except such portions as are deleted, modified or amended as follows:

(1) The chief building official may, in his or her discretion, waive the plan check fee for the second and all subsequent buildings or structures identical to a building or structure for which a plan check has been paid. This plan check fee waiver for subsequent submittals shall he limited to one (1) year following date of original fee payment. In each case the applicant must be the same for all permits.

(2) Demolition permits will be required.

(3) Section 105.1 of the California Building Code is amended to read as follows:

105.1 General. In order to hear and decide appeals of orders, decisions or determinations made by the building official relative to the application and interpretation of this code, there shall be and is hereby created a board of appeals consisting of members who are qualified by experience and training to pass on matters pertaining to building construction and who are not employees of the jurisdiction. The building official shall be an ex officio member of and shall act as secretary to said board but shall have no vote on any matter before the board. The board of appeals shall be appointed by the governing body and shall hold office at its pleasure. The board shall adopt rules of procedure for conducting its business, and shall render all decisions and findings in writing to the appellant with a duplicate copy to the building official.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be heard and decided by a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code.

(4) Section 106.4.4 of the California Building Code is amended to read as follows:

Section 106.4.4 Expiration. Unless otherwise authorized, every permit issued by the permit and resource management department under the provisions of this code shall expire by limitation three (3) years from the date of permit issuance. The Chief Building Official may limit a permit to a lesser time period when necessary to abate dangerous or substandard conditions. The Chief Building Official's decision regarding the limitation period shall be final.

All permit applications received by Sonoma County prior to the effective date of this ordinance and issued prior to expiration of the application shall have a permit expiration time period based on the provisions of the code in force at the time of the permit application.

Before any work can be recommended on any expired permit, a new permit shall first be obtained. The new permit shall be obtained for all work necessary to finish the project including work already completed that has not been previously inspected and approved by the department. The work authorized by the new permit shall be governed by the codes in force at the time of the new permit application. The fees for the new permit shall be based on the current fee schedule at full value of the previously permitted work minus the value of the work inspected and approved prior to expiration of the permit plus the full value of any new work not previously permitted.

(5) Section 107.3 of the California Building Code is amended to read as follows:

107.3 Plan Review Fees. When a plan or other data are required to be submitted by Section 106.3.2, a plan review fee shall be paid at the time of submitting plans and specifications for review. Said plan review fee shall be sixty-five percent (65%) of the building permit fee as shown in Table No. 1-A. Where plans are incomplete or changed so as to require additional plan review, an additional plan review fee shall be charged at the rate shown in Table No. 1-A.

When approved by the building official a reduction in plan review fees to fifty percent (50%) of that otherwise required may be granted where a peer review or other process results in substantially reduced plan review effort by the permit and resource management department.

(6) Section 107.4 of the California Building Code is amended to read as follows:

107.4 Expiration of Plan Review. If no permit is issued within one year following the date of application, the application shall expire by limitation, and plans and other data submitted for review may thereafter be returned to the applicant or destroyed by the building official. If, after such expiration, the original plans are resubmitted within 180 days following such expiration, the plan review fee shall be 25% of that otherwise required. No application shall be renewed in this fashion more than once. In order to further renew action on an application after expiration, the applicant shall resubmit plans and pay a new plan review fee.

(7) Table 1-A, Building Permit Fees, Table A-33-A, Grading Plan Review Fees, and Table A-33-B, Grading Permit Fees, of the California Building Code may be amended by ordinance of the board of supervisors annually or as needed to offset the costs of processing building permits. Tables 1-A, A-33-A and A-33-B incorporated herein as modified by county ordinance, shall be posted in the permit and resource management department.

(8) Section 203-B of the California Building Code is amended to revise the definition of "building" to read as follows:

BUILDING is any structure used or intended for supporting or sheltering any use or occupancy. Building is also any structure as to which state agencies have regulatory power, and housing or enclosure of persons, animals, chattels, equipment or property of any kind. Building is also any structure wherein things may be grown, made, produced, kept, handled, stored or disposed of, and all appendages, accessories, apparatus, appliances and equipment installed as a part thereof. Building shall not include machinery, equipment or appliances installed for manufacture or process purposes only, nor shall it include any construction installations which are not a part of a building, any tunnel, mine shaft, highway or bridge, or include any house trailer or vehicle which conforms to the Vehicle Code.

NOTE: Building shall have the same meaning as defined in Health and Safety Code section 17920 and 18908 for the applications specified in Sections 101.17.9 and 101.17.10.

(9) Section 203-B of the California Building Code is amended to revise the definition of "building, existing" to read as follows:

BUILDING, EXISTING, is a building legally erected prior to the adoption of this code, or one for which a legal building permit was issued for the construction or legalization thereof prior to the adoption of this code.

(10) Section 203-B of the California Building Code is amended to add the definition of "building, new" to read as follows:

BUILDING, NEW, is a building for which a legal building permit is issued for the construction or legalization thereof after the adoption of this code.

(11) Section 204-C of the California Building Code is amended to revise the definition of "chief of the fire department" to read as follows:

CHIEF OF THE FIRE DEPARTMENT is the county fire chief or his or her authorized representative for those portions of the unincorporated area of the county not in a fire protection district, and the local fire chief or his or her authorized representative for those portions of the unincorporated area of the county in a local fire protection district. Notwithstanding the preceding, the county fire chief shall be responsible for plan checking and inspection of new construction and alterations subject to this code within both those portions of the unincorporated area of the

county not in a fire protection district and those portions of the unincorporated area of the county in a local fire protection district, unless a local fire protection district notifies the county fire chef in writing that it has elected to have the local fire chief exercise those responsibilities within its jurisdictional area.

(12) Section 204-C of the California Building Code is amended to add the definition of "county fire chief" to read as follows:

COUNTY FIRE CHIEF is as defined in Section 13-6 of the Sonoma County Code.

(13) Section 205-D of the California Building Code is amended to add the definition of "dairy milking facility" to read as follows:

DAIRY MILKING FACILITY is a single story structure constructed of non-combustible materials with two or more open sides that is used exclusively for milking dairy animals. A dairy milking facility may have either an office or a storage area of less than 400 square feet. A dairy milking facility shall not have any sleeping areas within the structure.

(14) Section 207-F of the California Building Code is amended to add the definition of "fire department" to read as follows:

FIRE DEPARTMENT is the department of emergency services of the county for those portions of the county not in a local fire protection district, and the local fire protection district having jurisdiction for those portions of the county in a local fire protection district.

(15) Section 211-J of the California Building Code is amended to revise the definition of "jurisdiction" to read as follows:

JURISDICTION is the County of Sonoma, in the State of California.

(16) Section 213-L of the California Building Code is amended to add the definition of "local fire chief" to read as follows:

LOCAL FIRE CHIEF is as defined in Section 13-6 of the Sonoma County Code.

(17) Section 213-L of the California Building Code is amended to add the definition of "local fire protection district" to read as follows:

LOCAL FIRE PROTECTION DISTRICT is as defined in Section 13-6 of the Sonoma County Code.

(18) Section 215-N of the California Building Code is amended to add the definition of "new building" to read as follows:

NEW BUILDING. See "building, new."

(19) Section 217-P of the California Building Code is amended to add the definition of "private riding arena" to read as follows:

PRIVATE RIDING ARENA is an enclosed or unenclosed building or portion of a building used exclusively for private equestrian activities by the building owner, guests, or employees, not to exceed a capacity of thirty (30) persons. The area within the Private Riding Arena shall not be used for storage areas, animal stalls, offices, viewing areas, shows, events, public riding lessons, or similar uses or occupancies. Such buildings shall be classified as a Group U, Division 3 Occupancy.

(20) Section 220-S of the California Building Code is amended to add the definition of "single-family dwelling" to read as follows:

SINGLE-FAMILY DWELLING is a dwelling that contains one dwelling unit for one family of one or more persons. Single-family dwelling does not include a dwelling used for a large family day-care home, lodging house, congregate residence, or other similar use.

(21) Section 221-T of the California Building Code is amended to add the definition of "two-family dwelling" to read as follows:

TWO-FAMILY DWELLING is a dwelling that contains two dwelling units for two families of one or more persons. Two-family dwelling does not include a dwelling used for a large family day-care home, lodging house, congregate residence, or other similar use.

(22) Section 311.1, Division 3 of the California Building Code, is amended to add the following:

Repair work in S-3 occupancies is limited to the exchange, repair or maintenance of air conditioning, lubrication fluids and filters, fan belts, water hoses, windshield wipers, spark plugs, ignition wiring, points, condensers, distributors, air cleaners, starters, generators, light bulbs, lighting systems (including sealed beam headlights), wiring and fuses, front wheel bearings, tires, batteries including cables and brake repairs.

(23) Exception 3 is added to Section 506 of the California Building Code to read as follows:

3. The height of one story power plants of Type II one-hour, Type II-N, Type III one-hour or Type III-N construction shall be a maximum of 70 feet, that power generation involves no fossil or nuclear fuel to be consumed within the structure, and that clearance from property line is 100 feet or greater.

(24) Exception 5 is added to Section 904.1.2 of the California Building Code to read as follows:

5. Automatic fire-extinguishing systems in Group R, Division 3 Occupancies three stories or less may be in accordance with NFPA Standard 13-D, as adopted in Chapter 13 of the Sonoma County Code. These occupancies shall have sprinkler coverage in addition to that required by the Uniform Building Code Volume 3 or the NFPA Standards listed above in accessible attics and in attached Group U Occupancies as specified by Administrative Regulations issued pursuant to Chapter 13 of the Sonoma County Code.

(25) Section 904.1.4 is added to the California Building Code to read as follows:

904.1.4 Substitutions. Fire resistive substitution as specified in Section 508 shall be permitted when an automatic fire-extinguishing system is not required throughout a building by other sections of this code.

(26) Section 904.2.1 of the California Building Code is amended to read as follows:

904.2.1 Where required. An automatic fire-extinguishing system shall be installed in new and existing buildings as set forth in this section.

(27) Section 904.2.2 is amended to read as follows:

904.2.2 New buildings. An automatic fire-extinguishing system shall be installed throughout all new buildings, regardless of floor area or intended use.

EXCEPTIONS:

1. Detached Group U, Division 1 Occupancies.

2. Group U, Division 3 Occupancies except private riding arenas.

3. Private riding arenas, provided that all of the following conditions are met:

(a) The building has a minimum of 60 feet of clearance to property lines or other structures on all sides.

(b) The building has an on-site water supply complying with the requirements of this code.

(c) The building has an annual fire inspection by the chief of the fire department.

(d) The portions of the building that are not part of the private riding arena are equipped with an automatic fire-extinguishing system and are separated from the private riding arena by area separation walls meeting the requirements of Section 504.6 and Table 5-A.

4. Canopied winery crush pads, provided that all of the following conditions are met:

(a) The canopy and supporting structure are constructed of non-combustible materials.

(b) If attached, the crush pad is separated from other portions of the building by one-hour fire-resistive walls.

(c) The crush pad is not used for storage of combustible materials.

5. Dairy milking facilities.

(28) Sections 904.2.3.1 through 904.2.3.8, inclusive, are deleted and Section 904.2.3 is amended to read as follows:

904.2.3 Additions to existing buildings except single-family and two-family dwellings. An automatic fire-extinguishing system shall be installed throughout all existing buildings except single-family and two-family dwellings when the existing floor area is increased.

EXCEPTIONS:

1. When the existing floor area of a building is less than or equal to 5,000 square feet and the floor area is increased to not more than 6,600 square feet.

2. When the existing floor area of a building is greater than 5,000 square feet and the floor area is increased to not more than 8,000 square feet, provided that all of the following conditions are met:

(a) Area separation walls meeting the requirements of Section 504.6 and Table 5-A are used to subdivide the building into two or more separate compartments.

(b) No compartment has a floor area greater than 5,000 square feet.

3. Group U, Division 3 Occupancies except private riding arenas.

4. Private riding arenas, provided that all of the following conditions are met:

(a) The building has a minimum of 60 feet of clearance to property lines or other structures on all sides.

(b) The building has an on-site water supply complying with the requirements of this code.

(c) The building has an annual fire inspection by the chief of the fire department.

(d) The portions of the building that are not part of the private riding arena are equipped with an automatic fire-extinguishing system and are separated from the private riding arena by area separation walls meeting the requirements of Section 504.6 and Table 5-A.

5. Canopied winery crush pads, provided that all of the following conditions are met:

(a) The canopy and supporting structure are constructed of non-combustible materials.

(b) If attached, the crush pad is separated from other portions of the building by one-hour fire-resistive walls.

(c) The crush pad is not used for storage of combustible materials.

6. Dairy milking facilities.

(29) Sections 904.2.4.1 through 904.2.4.3, inclusive, are deleted and Section 904.2.4 is amended to read as follows:

904.2.4 Additions to existing single-family and two-family dwellings. An automatic fire-extinguishing system shall be installed throughout all existing single-family and two-family dwellings when the floor area is increased in such a way that seventy-five percent (75%) or more of the exterior walls are replaced.

(30) Section 904.2.5.1 is deleted and Section 904.2.5 is amended to read as follows:

904.2.5 Elevation of existing buildings. An automatic fire-extinguishing system shall be installed throughout all existing buildings when the building is elevated to: (i) three or more stories, or (ii) more than 35 feet in height from grade to the finished ceiling or exposed roof.

EXCEPTIONS:

1. An automatic fire-extinguishing system need not be provided when the area above 35 feet is provided for aesthetic purposes only and is unused and unoccupied.

2. An automatic fire-extinguishing system need not be provided when existing single-family and two-family dwellings are elevated to comply with the requirements of Chapter 7B of the Sonoma County Code, provided that all of the following conditions are met:

(a) The elevation creates a building no more than three stories in height.

(b) Two approved exits are provided for the highest floor, including a third story having less than 500 square feet of floor area.

(c) Approved interconnected smoke detectors are installed at each floor level and in all sleeping rooms and hallways.

(d) There is no expansion or modification of use other than installation of the exits required by subparagraph (b) above and a utility room less than 100 square feet. The space created at ground level by the elevation shall be used only as a Group U, Division 1 Occupancy private parking garage or as unused crawl space.

(e) Any addition to the building after the elevation shall require installation of an automatic fire-extinguishing system throughout the building.

(31) Sections 904.2.6.1 through 904.2.6.4, inclusive, are deleted and Section 904.2.6 is amended to read as follows:

904.2.6 Damage by fire or natural disaster. An automatic fire-extinguishing system shall be installed throughout all existing buildings damaged by fire or natural disaster when the floor area structurally damaged causes replacement of seventy-five percent (75%) or more of the exterior walls.

EXCEPTIONS:

1. Detached Group U, Division 1 Occupancies.

2. Group U, Division 3 Occupancies except private riding arenas.

3. Private riding arenas, provided that all of the following conditions are met:

(a) The building has a minimum of 60 feet of clearance to property lines or other structures on all sides.

(b) The building has an on-site water supply complying with the requirements of this code.

(c) The building has an annual fire inspection by the chief of the fire department.

(d) The portions of the building that are not part of the private riding arena are equipped with an automatic fire-extinguishing system and are separated from the private riding arena by area separation walls meeting the requirements of Section 504.6 and Table 5-A.

4. Canopied winery crush pads, provided that all of the following conditions are met:

(a) The canopy and supporting structure are constructed of non-combustible materials.

(b) If attached, the crush pad is separated from other portions of the building by one-hour fire-resistive walls.

(c) The crush pad is not used for storage of combustible materials.

5. Dairy milking facilities.

(32) Section 904.2.7 is amended to read as follows:

904.2.7 Changes in occupancy. An automatic fire-extinguishing system shall be installed throughout all existing buildings when a change in occupancy results in a change to the group or division classification of the building and an increase in the hazard classification for the building, as defined in Table 3-A.

(33) Section 904.2.8 is amended to read as follows:

904.2.8 Conversions of existing single-family and two-family dwellings. An automatic fire-extinguishing system shall be installed throughout all existing single-family and two-family dwellings when converted to a large family daycare home, lodging house, congregate residence, or other similar use.

(34) Sections 904.2.9 and 904.2.10 are deleted.

(35) Section 1503 of the California Building Code is amended to read as follows:

(a) General. Except as otherwise provided in subsection (b), the roof covering on any structure regulated by this code shall be as specified in Table No. 15-A and as classified in Section 1504.

(b) Roof Covering on Specified Structures. Notwithstanding any other provision of this code, the roof-covering on the following structures regulated by this code shall be a Class A roof-covering as classified in Section 1504:

1. Any new structure regulated by this code;

2. Any existing structure regulated by this code when more than fifty percent (50%) of the roof area of the structure is re-roofed;

3. Any addition regulated by this code when the addition creates a new roof and the floor area of any single floor of the addition exceeds six hundred forty (640) square feet.

(c) Roof-covering Assembly. The roof-covering assembly includes the roof deck, underlayment, interlayment, insulation and covering which is assigned to a roof-covering classification.

(36) Section 3306.2 of Appendix Chapter 33 of the California Building Code is amended to revise item 9 to read as follows:

9. A fill less than 1 foot (305mm) in depth and placed on natural terrain with a slope flatter than 1 unit vertical in five units horizontal (20% slope), or less than 3 feet (914mm) in depth, not intended to support structures, which does not exceed 50 cubic yards (38.3m) on any one lot and does not obstruct a drainage course. This exemption shall not apply to fill placed within the Laguna de Santa Rosa and within flood-prone urban areas defined in Section 3308.

(37) Section 3306.2 of Appendix Chapter 33 of the California Building Code is amended to add item 10 to read as follows:

10. Within flood-prone urban areas as defined in Section 7-13(a)(10) of the Sonoma County Code, a fill less than six (6) inches in depth and not exceeding 50 cubic yards, on any one lot or parcel of land, which is placed on natural terrain and does not obstruct a drainage course.

(38) Section 3308 of Appendix Chapter 33 of the California Building Code is amended to add the definition of "flood-prone urban area" to read as follows:

FLOOD-PRONE URBAN AREA shall include the following areas to the extent such areas are within the unincorporated portion of the County of Sonoma:

(a) That area within the boundaries defined on the north by River Road; on the west by the easterly boundary of the Laguna de Santa Rosa to its intersection with Highway 12 and continuing with the easterly limit of the City of Sebastopol to Highway 116; on the south by Highway 116 to its intersection with Old Redwood Highway then south to East Cotati Avenue and east to its intersection with Petaluma Hill Road; and on the east by Petaluma Hill Road, north to Highway 12 then west to Highway 101 and north to River Road.

Laguna de Santa Rosa shall be the Laguna de Santa Rosa and tributaries thereto, as shown, on the National Flood Insurance Program Flood Insurance Rate Map dated April 2, 1991 and which are within designated Zone AE and, which have a base flood elevation of 75 feet.

(39) Section 3313 of Appendix Chapter 33 of the California Building Code is amended to add subsections 3313.6 and 3313.7 to read as follows:

3313.6 Laguna de Santa Rosa Requirements. No fill shall be placed in the Laguna de Santa Rosa unless an engineering analysis is provided which demonstrates that no reduction in flood storage capacity within the Laguna will result from the fill placement and related improvements.

3313.7 Flood-Prone Urban Area Requirements:

1. In addition to requirements contained in Section 3309, plans, calculations and other documentation shall be submitted to the permit and resource management department demonstrating the proposal will not adversely affect drainage.

2. Before final approval of work authorized by any grading permit, the building official may require that a registered civil engineer inspect the work and verify that the work conforms to approved plans and specifications.

3. Appeals from the requirements of this section may be made to the board of building appeals pursuant to Section 7-4 of this chapter.

EXCEPTION: Appeals of any notice and order to abate a violation of this section shall be heard and decided by a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code.

(40) Section 3316 of Appendix Chapter 33 of the California Building Code is amended to read as follows:

Section 3316 - Erosion Control

3316.1 Slopes. The faces of cut and fill slopes shall be prepared and maintained to control against erosion. This control may consist of effective planting, or other means considered by current engineering practice to be Best Management Practices (BMP's). Erosion control measures shall be in place and maintained from October 15 to April 15. No construction, grading, cutting or filling shall be undertaken between October 15 and April 15 except in accordance with an erosion control plan approved by the chief building official. Where cut slopes are not subject to erosion due to the erosion resistant character of the materials, such protection may be omitted.

3316.2 Other Devices. Where necessary, check dams, cribbing, riprap, siltation fences, straw wattles or any other devices or methods shall be used to control erosion and provide safety.

3316.3 Erosion Control Measures During Construction. The proposed measures to protect against erosion during the construction process shall be shown on the plans. The details, location and description of said measures shall also be included on the plans. The proposed measures must be installed prior to the start of construction, and must be maintained to accommodate any changes in site conditions until project completion.

3316.4 Erosion Control Measures Post Construction. The proposed permanent erosion control measures shall be shown on the plans, which shall also include the details, location and description of said measures. The permanent measures shall be installed in accordance with an erosion control plan approved by the chief building official. Planting completed during the summer must be monitored and maintained until well-established or until the rainy season whichever comes first.

(b) Provisions Requiring a Preliminary Soil Report of a Subdivision and Specifying the Conditions Under Which a Soil Investigation of Each Lot is Required.

(1) Purpose. This subsection is enacted pursuant to requirements of Health and Safety Code Section 17953 et seq.

(2) Preliminary Soil Report. Prior to the submission of the final subdivision map, the subdivider shall file with the permit and resource management department a preliminary soil report, prepared by a civil engineer, who is registered by the state, based upon adequate test borings or excavation of every subdivision, where a tentative and final map is required pursuant to Section 66426 of the Government Code.

The preliminary soil report may be waived if the permit and resource management department shall determine that, due to the knowledge of such department as to the soil qualities of the subdivision, no preliminary analysis is necessary.

(3) Soil Investigation. If the preliminary soil report indicates the presence of critically expansive soils or other soil problems which, if not corrected, would lead to structural defects, a soil investigation of each lot in the subdivision shall be prepared by a civil engineer, who is registered by the state. The soil investigation shall recommend corrective action which is likely to prevent structural damage to each dwelling proposed to be constructed on the expansive soil. The report shall be filed with the permit and resource management department.

(4) Approval of Soil Investigation. The permit and resource management department shall approve the soil investigation if it determines that the recommended corrective action is likely to prevent structural damage to each dwelling to be constructed on each lot in the subdivision. The building permit shall be conditioned upon the incorporation of the approved recommended corrective action in the construction of each dwelling.

(c) California Mechanical Code is adopted and incorporated herein by reference, save and except such portions as are deleted, modified or amended as follows:

(1) Section 114.4 of the California Mechanical Code is amended to read as follows:

114.4 Expiration. Unless otherwise authorized, every mechanical permit issued by the permit and resource management department under the provisions of this code shall expire by limitation three (3) years from the date of permit issuance. The chief building official may limit a permit to a lesser time period when necessary to abate dangerous or substandard conditions. The chief building official's decision regarding the limitation period shall be final.

All permit applications received by Sonoma County prior to the effective date of this ordinance and issued prior to expiration of the application shall have a permit expiration time period based on the provisions of the code in force at the time of the permit application.

Before any work can be recommenced on any expired permit, a new permit shall first be obtained. The new permit shall be obtained for all work necessary to finish the project including work already completed that has not been previously inspected and approved by the department. The work authorized by the new permit shall be governed by the codes in force at the time of the new permit application. The fees for the new permit shall be based on the current fee schedule at full value of the previously permitted work minus the value of the work inspected and approved prior to expiration of the permit plus the full value of any new work not previously permitted.

(2) Section 115.2 of the California Mechanical Code is amended to read as follows:

115.2 Permit Fees. The fee for each permit shall be set forth by separate fee ordinance of the board of supervisors.

(3) Section 115.4 of the California Mechanical Code is amended to read as follows:

115.4 Expirations of Plan Review. If no permit is issued within one (1) year following the date of application, the application shall thereupon expire by limitation, and plans and other data submitted for review may thereafter be returned to the applicant or destroyed by the building official. If, after such expiration, the original plans are resubmitted within 180 days following such expiration, the plan review fee shall be one-half of that otherwise required. No application shall be renewed in this fashion more than once. In order to further renew action on an application after expiration, the applicant shall resubmit plans and pay a new plan review fee.

(d) The California Electrical Code is adopted and incorporated herein by reference.

(e) The California Plumbing Code Chapters 1-15 and Appendices A, B, C, D, G-A, I, K and L, are adopted and incorporated herein by reference, save and except such portions as are deleted, modified or amended as follows:

(1) Section 203.0 of the California Plumbing Code is amended to read as follows:

Administrative Authority - The chief building official.

(2) The California Plumbing Code is amended to add the following sections:

305.4 Every dwelling or other building or place where persons congregate, reside or are employed shall be provided with an adequate number of water flush toilets connected to a sewage disposal system which shall consist of a public sewer connection or a septic tank and a system of underground drains for the disposal of the tank effluent, or other systems approved by the director of the permit and resource management department. Such system shall be constructed to meet the requirements of construction and maintenance provided in this chapter and the codes adopted hereby.

305.5 No privy, including vault privies, chemical privies, pit privies or cesspools shall be constructed, maintained or used except upon written approval of the director of permit and resource management department unless otherwise specifically permitted by law.

305.6 It is unlawful to discharge from any privy, cesspool, septic tank, container, sewer pipes or conduits not connected to a public sewer system, sewage, polluted or contaminated water or any matter of substance offensive, injurious or dangerous to public health where such water overflows any land whatsoever, including tideland, or where such water empties, flows, seeps or drains into or adversely affects any springs, streams, rivers, lakes, other waters or any public highway within the County of Sonoma.

(3) Section 103.3.4 of the California Plumbing Code is amended to read as follows:

103.3.4 Expiration. Unless otherwise authorized, every plumbing permit issued by the permit and resource management department under the provisions of this code shall expire by limitation three (3) years from the date of permit issuance. The chief building official may limit a permit to a lesser time period when necessary to abate dangerous or substandard conditions. The chief building official's decision regarding the appropriate limitation period shall be final.

All permit applications received by Sonoma County prior to the effective date of this ordinance and issued prior to expiration of the application shall have a permit expiration time period based on the provisions of the code in force at the time of the permit application.

Before any work can be recommenced on any expired permit, a new permit shall first be obtained. The new permit shall be obtained for all work necessary to finish the project including work already completed that has not been previously inspected and approved by the department. The work authorized by the new permit shall be governed by the codes in force at the time of the new permit application. The fees for the new permit shall be based on the current

the current fee schedule full value of the previously permitted work minus the value of the work inspected and approved prior to expiration of the permit plus the full value of any new work not previously permitted.

(4) Section 103.4.1 of the California Plumbing Code is amended to read as follows:

103.4.1 Permit Fees. Each applicant shall pay for each permit, at the time of issuance, a fee in accordance with fee schedule adopted by the Board of Supervisors.

(5) The phrase "abutting lot" as used in Section 721.2 and Appendix Chapter K Section K1(f) of the California Plumbing Code, includes:

(1) An unimproved lot connected to another lot by an easement provided the lots are in common ownership;

(2) An improved lot connected to another lot by an easement. The lots need not be under common ownership so long as the lot owner has an easement over the abutting lot sufficient for private sewage disposal subject to approval of the director of permit and resource management department.

(6) In Table K-1 of the California Plumbing Code, the first sentence under "NOTE" shall be deleted due to the general topographic nature of Sonoma County. Horizontal distances between parts of a leaching system shall be determined by the director of permit and resource management.

(7) Section K-3 of Appendix Chapter K of the California Plumbing Code, 1998 Edition is amended by deleting Item 3, the exception thereto and Item 5.

(8) Section 413.1 of the California Plumbing Code is amended to read as follows:

413.1 Fixture. Plumbing fixtures shall be provided for the type of building occupancy and in the minimum number shown in Appendix Chapter 29 of the California Building Code.

(f) Uniform Administrative Code Provisions for the National Electrical Code is adopted and incorporated by reference, save and except Section 304(a), (b) and (c) of said Code Provisions and further save and except such portions of the Code Provisions as are deleted, modified or amended as follows:

(1) Section 203.1 is amended to read as follows:

203.1 General. In order to hear and decide appeals of orders, decisions or determinations made by the building official relative to the application and interpretations of this code, there shall be and is hereby created a board of appeals consisting of members who are qualified by experience and training to pass upon matters pertaining to electrical systems and equipment and who are not employees of the jurisdiction. The building official shall be an ex officio member and shall act as secretary to said board but shall have no vote upon any matter before the board. The board of appeals shall be appointed by the governing body and shall hold office at its pleasure. The board shall adopt rules of procedure for conducting its business and shall render all decisions and findings in writing to the appellant with a duplicate copy to the building official.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be heard and decided by a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code.

(2) Section 303.4 of the Uniform Administrative Code for the National Electrical Code is amended to read as follows:

303.4 Expiration. Unless otherwise authorized, every electrical permit issued by the Permit and Resource Management Department under the provisions of this code shall expire by limitation three (3) years from the date of permit issuance. The Chief Building Official may limit a permit to a lesser time period when necessary to abate dangerous or sub-standard conditions. The Chief Building Official's decision regarding the appropriate limitation period shall be final.

All permit applications received by Sonoma County prior to the effective date of this ordinance and issued prior to expiration of the application shall have a permit expiration time period based on the provisions of the code in force at the time of the permit application.

Before any work can be recommenced on any expired permit, a new permit shall first be obtained. The new permit shall be obtained for all work necessary to finish the project including work already completed that has not been previously inspected and approved by the department. The work authorized by the new permit shall be governed by the codes in force at the time of the new permit application. The fees for the new permit shall be based on the current fee schedule at full value of the previously permitted work minus the value of the work inspected and approved prior to expiration of the permit plus the full value of any new work not previously permitted.

(3) Section 304.1 of the Uniform Administrative Code for the National Electrical Code is amended to read as follows:

304.1 Permit Fees. The fee for each electrical permit shall be as set forth in a separate fee ordinance of the board of supervisors.

(g) Uniform Housing Code, is adopted and incorporated by reference, save and except such portions as are deleted, modified and amended as follows:

(1) Section 203.1 of the Uniform Housing Code is amended to read as follows:

203.1 General. In order to hear and decide appeals of orders, decisions or determinations made by the building official relative to the application and interpretations of this code, there shall be and is hereby created a housing advisory and appeals board consisting of members who are qualified by experience and training to pass upon matters pertaining to building construction and who are not employees of the jurisdiction. The building official shall be an ex officio member and shall act as secretary to said board but shall have no vote upon any matter before the board. The housing advisory and appeals board shall be appointed by the governing body and shall hold office at its pleasure. The board shall adopt rules of procedure for conducting its business and shall render all decisions and findings in writing to the appellant with a duplicate copy to the building official. Appeals to the board shall be processed in accordance with the provisions contained in Section 1201 of this code. Copies of all rules of procedure adopted by the board shall be delivered to the building official, who shall make them accessible to the public.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be heard and decided by a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code.

(2) Section 401 is amended to add the definition of "building official" as follows:

The term "building official" shall be the chief building official of the county except the health officer of the county shall be the enforcement officer in matters pertaining to the maintenance, sanitation, ventilation, use or occupancy of apartment houses, hotels and dwellings.

(3) Subsection (5) of Section 1101.2 is amended to read as follows:

Statements advising (i) that any person having any record title or legal interest in the building may appeal a notice and order of an abatement proceeding to a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code or may appeal any other action of the building official to the housing advisory and appeals board, provided the appeal is made in writing as provided in this code, and filed with the building official within 30 days from the date of service of such notice and order; and (ii) that failure to appeal will constitute a waiver of all right to an administrative hearing and determination of the matter.

(4) Section 1201.2 is deleted.

(5) Section 1201.3 is amended to read as follows:

1201.3. Scheduling and Noticing Appeal for Hearing. As soon as practicable after receiving the written appeal, the housing advisory and appeals board shall fix a date, time and place for the hearing of the appeal by the board. Such date shall be not less than 10 days or more than 60 days from the date the appeal was filed with the building official. Written notice of the time and place of the hearing shall be given at least 10 days prior to the date of the hearing to each appellant by the secretary of the board either by causing a copy of such notice to be delivered to the appellant personally or by mailing a copy thereof, postage prepaid, addressed to the appellant at the address shown on the appeal.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be noticed, heard and decided pursuant to Section 1-7.3 of the Sonoma County Code.

(6) Section 1301.1 is amended to read as follows:

1301.1 Hearing Examiners. The board may appoint one or more hearing examiners or designate one or more of its members to serve as hearing examiners to conduct the hearings. The examiner hearing the case shall exercise all powers relating to the conduct of the hearings until it is submitted to the board for decision.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be heard and decided by a hearing officer pursuant to Chapter 1-7.3 of the Sonoma County Code.

(h) Uniform Code for the Abatement of Dangerous Building is adopted and incorporated by reference save and except such portions as are deleted, modified and amended as follows:

(1) Section 205.1 is amended to read as follows:

205.1 General. In order to hear and decide appeals of orders, decisions or determinations made by the building official relative to the application and interpretations of this code, there shall be and is hereby created a board of appeals consisting of members who are qualified by experience and training to pass upon matters pertaining to building construction and who are not employees of the jurisdiction. The building official shall be an ex officio member and shall act as secretary to said board but shall have no vote upon any matter before the board. The board of appeals shall be appointed by the governing body and shall hold office at its pleasure. The board shall adopt rules of procedure for conducting its business and shall render all decisions and findings in writing to the appellant, with a duplicate copy to the building official. Appeals to the board shall be processed in accordance with the provisions contained in Section 501 of this code. Copies of all rules or regulations adopted by the board shall be delivered to the building official, who shall make them freely accessible to the public.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code

and the California Fire Code shall be heard and decided by a hearing officer pursuant to Section 1-7.3 of the Sonoma County Code.

(2) Section 501.2 is deleted.

(3) Section 501.3 is amended to read as follows:

Section 501.3. Scheduling and Noticing Appeal for Hearing. As soon as practicable after receiving the written appeal, the board of appeals shall fix a date, time and place for the hearing of the appeal by the board. Such date shall not be less than 10 days nor more than 60 days from the date the appeal was filed with the building official. Written notice of the time and place of the hearing shall be given at least 10 days prior to the date of the hearing to each appellant by the secretary of the board either by causing a copy of such notice to be delivered to the appellant personally or by mailing a copy thereof, postage prepaid, addressed to the appellant at the address shown on the appeal.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be noticed, heard and decided pursuant to Chapter 1-7.3 of the Sonoma County Code.

(4) Section 601.1 is amended to read as follows:

601.1 Hearing Examiners. The board may appoint one or more hearing examiners or designate one or more of its members to serve as hearing examiners to conduct the hearings. The examiner hearing the case shall exercise all powers relating to the conduct of hearings until it is submitted to the board for decision.

EXCEPTION: Appeals of any notice and order to abate any violation of the Uniform Code for the Abatement of Dangerous Buildings, Uniform Housing Code, Uniform Administrative Provisions of the National Electrical Code and the California Fire Code shall be heard and decided by a hearing officer pursuant to Chapter 1-7.3 of the Sonoma County Code.

(5) Section 701.1 is amended to read as follows:

701.1 General. After any order of the building official, hearing officer or the board of appeals made pursuant to this code shall have become final, no person to whom any such order is directed shall fail, neglect or refuse to obey any such order. Any such person who fails to comply with any such order is guilty of a misdemeanor.

(6) Section 701.2 is amended to read as follows:

Section 701.2 Failure to Obey Order. If, after any order of the building official, hearing officer or board of appeals made pursuant to this code has become final, the person to whom such order is directed shall fail, neglect or refuse to obey such order, the building official may (i) cause such person to be prosecuted under Section 701.1 or (ii) institute any appropriate action to abate such building as a public nuisance.

(7) Section 901 is amended to read as follows:

The director of the Permit and Resource Management Department shall keep an itemized account of the expense incurred by this jurisdiction in the repair or demolition of any building done pursuant to the provisions of Section 701.3, Item 3, of this code.

(i) Uniform Building Security Code is adopted and incorporated by reference.

(j) Uniform Swimming Pool Spa and Hot Tub Code is adopted and incorporated by reference.

(k) California Energy Code is adopted and incorporated by reference.

(l) California Historical Building Code is adopted and incorporated by reference.

(m) California Code for Building Conservation is adopted and incorporated by reference.

(n) California Referenced Standards Code is adopted and incorporated by reference.

(o) California Building Standards Administrative Code is adopted and incorporated by reference.

(p) Volume 3 of the Uniform Building Code is adopted and incorporated by reference. (Ord. No. 5402 § 1, 2003: Ord. No. 5374 § 1(a), 2002: Ord. No. 5167 § 1(i), 1999: Ord. No. 5086 § 1, 1997; Ord. No. 4959 §§ 1, 2, 1996; Ord. No. 4941 § 4, 1996; Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-14. Addition of laws that are enforced by the permit and resource management department or by the public health officer as designated in the applicable law.

(a) State of California Health and Safety Code Division 13, Part 2, Part 2.1 and Part 2.2 and State of California Administrative Code Title 25, relating to the administration, construction, maintenance, use and occupancy of mobile homes, located on parcels of land other than in mobile home parks. Except for those obligations imposed upon the public health officer, the permit and resource management department is charged with the administrative of the aforementioned regulations with the unincorporated areas of the county of Sonoma.

(b) State of California Health and Safety Code Division 22, Chapter 4.

(c) State of California Health and Safety Code Division 13, Part 2.3 and State of California Administrative Code Title 17, Sections 30700-30751.

(d) State of California Health and Safety Code Division 20, Chapter 1, Health and Safety of Bathers and State of California Administrative Code Title 17, Sections 7774-7833.

(e) State of California Health and Safety Code Division 5, Chapter 7, Water and Water Systems.

(f) State of California Administrative Code, Title 17, Sections 13650-13693, Roadside Stand Regulations.

(g) State of California Administrative Code, Title 24, Part 1, 2, 3, 5, 6 and 8. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-15. Private swimming pool—General.

(a) For purposes of this section, "private swimming pool" shall include any structure, whether in-ground or above-ground, designed or used for swimming or recreational bathing that contains water in excess of eighteen (18) inches. For purposes of this section, "private swimming pool" shall not include:

(1) Swimming pools operated for the use of the general public with or without charge, or for the use of the members and guests of a private club, unless such pool is located on the grounds of a private single-family home;

(2) Hot tubs or spas with locking safety covers that comply with the American Society for Testing Materials - Emergency Performance Specification (ASTM-ES 13-89 and ASTM-ES 13-91);

(3) Swimming pools located at an apartment complex or any residential setting other than a single-family home; and

(4) Swimming pools located at any facility regulated by the State Department of Social Services even if the facility is also used as the private residence of the operator.

(b) No building permit shall be issued for any private swimming pool, except in compliance with this section and Article 2.5 of Chapter 5 of Part 10 of Division 104 of the California Health and Safety Code (commencing with Section 115920 of the California Health and Safety Code), and further providing that:

(1) If the pool is equipped with a power-operated safety pool cover pursuant to California Health and Safety Code Section 115922(b), the control for the pool cover shall be mounted at least sixty inches (60") above grade or above the floor; and

(2) If doors providing direct access from the home to the pool are equipped with exit alarms pursuant to California Health and Safety Code Section 115922(c), the exit alarms shall produce sounds at or exceeding sound pressure of eighty (80) DB at ten feet (10') distance from the alarm emitter.

(c) Private swimming pools constructed prior to June 1, 1998, shall be equipped with at least one of the following safety features:

(1) The pool is isolated from access to a home by an enclosure that has all of the following characteristics:

(A) Any access gates through the enclosure open away from the swimming pool, and are self-closing with a self-latching device placed no lower than sixty (60") inches above the ground;

(B) A minimum height of sixty (60") inches;

(C) A maximum vertical clearance from the ground to the bottom of the enclosure of two (2") inches;

(D) Gaps or voids, if any, do not allow passage of a sphere equal to or greater than four (4") inches in diameter; and

(E) An outside surface free of protrusions, cavities or other physical characteristics that would serve as hand-holds or footholds that could enable a child below the age of five (5) years to climb over.

(2) The pool is equipped with a manually or power-operated safety pool cover that meets all of the performance standards of the American Society for Testing and Materials (ASTM), in compliance with standard F1346-91. If the safety, pool cover is electrically operated, the control for the pool cover shall be mounted at least sixty inches (60″) above grade or above the floor;

(3) All doors providing direct access from the home to the pool are equipped with exit alarms, either battery operated or connected to the electrical wiring of the residence, that make audible, continuous alarm sounds when the door is opened or left ajar. The exit alarms shall produce sounds at or exceeding sound pressure of eighty (80) DB at ten feet (10′) distance from the alarm emitter;

(4) All doors providing direct access from the home to the pool are equipped with a self-closing, self-latching device with a release mechanism placed no lower than fifty-four (54″) inches above the floor; or

(5) Other means of protection, if the degree of protection afforded is equal to or greater than that afforded by any of the devices set forth in subdivisions (1) through (4), inclusive, of this subsection, as determined by the building official.

(d) Applications for building permits for the construction of private swimming pools shall show compliance with the requirements established by subsection (b) and with following:

(1) All plans submitted to the county for private swimming pools shall include a plot plan. Pool plans, specifications and design calculations shall be prepared by a civil or structural engineer, licensed to practice in the state of California.

(2) Soil around the private swimming pool shall slope away from the pool to prevent surface waters from draining into the pool and to prevent ponding, or a drainage system shall be provided to collect surface water.

(3) Drywells shall be ten feet, ten inches (10′ 10″) minimum in depth. The drywell must be lined with masonry, having solid mortar joints to a point two feet, zero inches (2′ 0″) below the bottom of the swimming pool. Alternate methods of waste water disposal may be approved by the county public health officer.

(4) For private swimming pool design and construction, soils in Sonoma County shall be assumed to be expansive unless the owner can show by actual soil tests, performed by a recognized soil testing laboratory, that the soils are not expansive.

(5) Additional design criteria for private swimming pools may include, but not necessarily be limited to, consideration of geologic, geographic and topographic features of a pool site, groundwater, soil conditions, performance standards and maintenance requirements. The building official may require whatever information he deems necessary to satisfy himself that a pool design protects the public health and safety.

(6) Final inspection, approval and use of all new, repaired or remodeled private swimming pools shall be withheld until all of the above requirements have been met. (Ord. No. 5167 § 1(j), 1999; Ord. No. 5102 § 1, 1998: Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-16. Signs.

(a) Signs and outdoor advertising structures erected or constructed shall conform to all zoning regulations, department of transportation and public works requirements and be structurally designed and constructed to comply with the California Building Code for resisting wind, gravity and seismic forces.

(b) Political campaign signs shall be, if approved by the permit and resource management department for a limited period, exempt from meeting the requirements of the above unless it is determined by the building official that they pose a threat to life or limb. (Ord. No. 5167 § 1(k), 1999; Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-17. Regulations for the construction, relocation, repair, maintenance, use and occupancy of floating homes and floating home moorages.

(a) Purpose. The purpose of this section is to provide minimum standards to safeguard life or limb, health, property and public welfare by regulating the design, construction, quality of materials, use and occupancy, location and maintenance of all floating homes and floating home moorages within the county of Sonoma.

(b) Scope. The provisions of this section shall apply to the construction, alteration, repair, demolition, removal, relocation of berthing of any floating home within the county, and to the requirements for floating home sites and floating home moorages together with appurtenant structures and facilities as regulated herein.

(c) Application to Existing Floating Homes and Moorages. Floating homes and floating home moorages in existence prior to the effective date hereof shall be examined by the building official and health officer and shall comply with the requirements for new floating homes, new floating home sites and new floating home moorages as provided in this part, it being expressly found and determined that the public health and safety require and justify the retrospective application of all the provisions contained in this section; provided, however, that the building official may grant an exception to strict compliance with specifications in the building code if he finds and determines a floating home which is in existence prior to the effective date thereof does not by reason of a violation of said code, adversely affect the public health, safety and welfare, and that said floating home otherwise complies with the requirements of this section.

(d) Application to Moorage Occupancies Other Than Floating Homes. Moorage structures, floatable or otherwise, and occupied or intended to be occupied for purposes other than as a floating home shall conform with the applicable requirements of this section with respect to flotation, compartmentation, construction sanitation, sewage disposal, plumbing, electrical and other utility systems, open spaces, fire protection, movement or relocation, certificate of occupancy and to the requirements of such uses or occupancies as are administered and enforced by the health officer and building official.

(e) Definitions. The following definitions apply to the words and phrases of this section, unless the context clearly indicates otherwise.

(1) "Berth" or "moor" means the fixing of a floating home by anchoring or being at an approved floating home site. Berth or moor shall not include intentional grounding, beaching or placement on piles, wharves, docks or other permanently fixed supports except as may be permitted in emergencies or for making required repairs.

(2) Floating Homes. A "floating home" is any building supported by means of flotation with one hundred percent (100%) flotation occurring at all times, designed to be used without a permanent foundation, used, intended or designed to be built, used, rented, leased, let or hired out to be occupied, or which is occupied for living purposes by one family with facilities for living, sleeping, cooking and eating. Any such building used or intended to be used, as a dwelling for more than one family is prohibited with the county. The term "floating home" shall include "houseboat" or "ark" but shall not include any vessel designed or used primarily for commercial and recreational purposes.

(3) "Floating home moorage" means a waterfront facility for the moorage of one (1) or more floating homes, and the land and water premises on which such facility is located. Moorage must provide flotation at all times.

(4) Floating Home Site. A "floating home site" is a part of a floating home moorage located over water and designed to accommodate one (1) floating home.

(5) "Garbage" means all discarded putrescible waste matter and all discardable rubbish but not including sewage or human or animal excrement.

(6) "Health officer" means health officer of the county of Sonoma or his authorized representative assigned to the county of Sonoma.

(7) Nuisance. "Nuisance" includes:

(i) Any public nuisance known at common law or in equity jurisprudence;

(ii) Whatever is dangerous to human life or is detrimental to health;

(iii) Overcrowding a room with occupants;

(iv) Insufficient ventilation or illumination;

(v) Inadequate or unsanitary sewage or plumbing facilities;

(vi) A floating home moored in an area that does not provide flotation at all times;

(vii) Any of those items with exception to foundations described as a nuisance in Chapter 7 of the Code of the County of Sonoma and the Uniform Housing Code.

(8) Person. The term "person" shall include any person, firm, association, corporation or any members, agents or employees of any of the foregoing.

(9) Sewage. The term "sewage" means any and all waste substance, liquid or solid, associating with human habitation, whether or not it contains human or animal excreta or excrement, offal or any feculent matter.

(10) Story. "Story" is the portion of a floating home between the upper surface of the deck or ceiling next above.

(11) Superstructure. "Superstructure" is that portion of a floating home above the lowest deck or the level of flotation.

(12) Transient Vessel. The term "transient vessel" shall mean any vessel temporarily moored in the county of Sonoma which is occupied for a period of less than four (4) consecutive days or ten (10) days in any calendar month.

(13) Vessel. The term "vessel" means any watercraft of any type or size, including but not limited to barges, ferry boats, arks, yachts, houseboats, floating homes and rafts.

(14) Waterway. The term "waterway" means any water, waterway, lake, river, creek, canal, lagoon, bay, inlet, slough, tributary or arm of the sea situated within or bounding the county of Sonoma.

(f) Movement or Relocation of Floating Homes. Floating homes proposed to be moved into the county or proposed to be moved from one moorage site to another moorage site within the county shall comply with the requirements of this section pertaining to new floating homes.

No floating home shall be moved or relocated unless relocation permit has been issued by the permit and resource management department.

No floating home shall be moved into or relocated within the county if, after inspection and investigation by the building official, it is found to be dilapidated, unseaworthy or otherwise substandard to such an extent that it would be impractical to repair, improve or rehabilitate said floating home in accordance with the requirements of this section for new floating homes.

The building official shall not issue a permit to move or relocate a floating home until the site plan has received approval from the fire chief, the health officer, the director of permit and resource management department, or their duly authorized staff.

The fee for relocation permit is fifty-three dollars ($53.00) or as set by ordinance by the board of supervisors.

(g) Requirements For and Location of Moorages.

(1) Moorage, Register of Ownership of Floating Homes. Every owner or operator of a floating home moorage shall maintain a current register of every floating home moored on the premises under his control, such register to record the name and address of the legal owner of each floating home. A copy of said register shall be available on request to the building official.

(2) Moorage Location. Floating homes shall be berthed or moored in a marina, harbor or similar facility conforming to the requirements of this section and allocated on privately owned or privately controlled property. Moorages shall be located in any waterway or fairway, or in the public waters of any street or street end.

(3) Moorage Site Plan. Three (3) copies of a moorage site plan drawn to scale and fully dimensioned shall be submitted by the owner of said moorage to the building official for approval. The moorage plan shall include the following details.

(i) Name and address of an owner or operator;

(ii) Address and legal description of the property on which moorage is located;

(iii) The dimensions of the floating home moorage site;

(iv) The location of abutting public waterways;

(v) The location and dimensions of private waterways and land access to the moorage;
(vi) The location and identification of individual floating home sites;
(vii) The location and dimension of off-street parking spaces;
(viii) The location and dimensions of walkways and any accessory structures or facilities;
(ix) The water service system;
(x) The fire protection system;
(xi) The electrical service and lighting system;
(xii) The complete sewage system including main sewer and side sewers serving each floating homesite.

(h) Regulations for the Construction, Repair, Maintenance, Use and Occupancy of Floating Homes. The rules and regulations applicable to floating homes shall be all those rules, regulations, procedures and fee schedules as determined by the board of supervisors except as modified herein and/or herein provided.

(i) Material. All material, such as decking, siding and subflooring which is subjected to moisture or water splash shall be of a type not adversely affected by moisture, or shall be treated.

(j) Construction. Flooring, wall and flotation shall be designed and construction by use of diaphragm walls in such a manner that the superstructure acts as an independent unit and is not adversely affected by point reactions under the flotation.

(k) Ramps or horizontal entrance ways. Ramps shall be not less than thirty-six inches (36″) in width, exclusive of required handrails which shall not reduce the width more than three inches (3″).

Ramps or horizontal exits, other than mooring docks, shall be provided with two handrails or guard railings.

Railings shall be designed to withstand a twenty (20) pound-lateral line load along the top rail. Railings shall be not less than forty-two inches (42″) in height above the ramp floor, and in open-type railings intermediate members shall not be spaced more than four inches (4″) apart.

Private ramps or horizontal exits shall be capable of carrying a live load in accordance with the following schedule.

Live Load	Length of Ramp Between Supports
50 psf	0 to 5 feet
40 psf	5 feet to 10 feet
30 psf	OVER 10 feet

Ramp design shall also include dead load. Minimum framing members shall be two inch by four inch (2″ x 4″) if constructed of wood.

All ramps and horizontal exits shall have exit illumination with minimum intensity of one foot candle at floor level of entry or one-tenth (1/10) foot candle on walkways or ramps. Alternate materials and methods of construction may be allowed as provided in the Sonoma County Code.

(l) Inboard Sewerage Device. A sewage receiving tank and ejector device must be installed aboard every floating home. Said device shall consist of a tank with a liquid capacity not less than thirty (30) gallons, nor more than forty (40) gallons, and shall be equipped with a two inch outlet and a one-half (½) h.p. pump. Said device must connect to the local sewerage lateral system, when the floating home is moored in the waters within, adjoining or encompassed in the county of Sonoma.

(m) Water Distribution. Water shall not be piped to supply floating homes through flexible hose unless the hose is a high-pressure type terminating in approved connectors and is preceded by an approved backflow prevention device. No hose shall be immersed in water or run exposed on docks, piers, etc. Length of hose shall not be excessive.

(n) Fuel-Gas Piping. All gas piping installed in floating homes shall be made with approved high-pressure hose and terminate in approved positive disconnect couplings. Gas hoses shall not be immersed in water or run exposed on docks, piers or floating homes. Length of hose shall not be excessive.

(o) A wiring system shall be nominally rated 115-230 volts, 3 wire AC, with a grounded neutral supplemented with a No. 6 minimum (or the equivalent) equipment ground conductor as an integral part of a cable assembly connected to a grounding electrode on the shore facilities while providing a minimum of one hundred (100) amperes to the houseboat, shall be provided for in all floating homes.

(p) Power Supply. Service equipment shall be located adjacent to the floating home and may not be mounted in or on the floating home.

The power supply to the floating home shall be comprised of feeder circuits consisting of not more than two floating home supply cords, each rated fifty (50) amperes minimum. Larger cords or permanently installed circuits may be used if desired.

(q) Supply Cord. Each floating home supply cord shall be approved and have four conductors, one of which shall be identified by a continuous green color with a yellow stripe. The attachment plug, connectors and mating receptacles shall be 3-pole, 4-wire grounding types covered by American Standard C-73 attachment plug and receptacles. The power supply cord shall be permanently attached to the distribution panel. A suitable clamp or equivalent shall be provided at the distribution panel to afford strain relief for the cord in order to prevent strain at the terminals. The length of power supply cord shall not be excessive.

(r) Second Supply Cord. Where a second fifty (50)-ampere floating home supply cord is installed, the two (2) cords shall not be interconnected on either the line side or the load side except that the grounding circuits and grounding means shall be electrically interconnected.

(s) Disconnection Means. Disconnecting means shall be provided in each floating home by approved service entrance equipment, consisting of circuit breakers, or a switch and fuses, and their accessories installed in a readily accessible location near the point the supply cord or conductors enter the floating home. This equipment shall contain a solderless type of grounding connector or bar with sufficient terminals for all grounding conductors. The neutral bar termination of the grounded circuit conductors shall be insulated. The disconnecting equipment shall have a rating suitable for the connected load.

Where two (2) power supply cords are installed disconnecting means shall be provided for each cord but may be combined in single equipment without electrical interconnections other than for grounding purposes. Branch circuit equipment may be combined with the disconnecting means as a single assembly, and designed as a distribution panel. Plug fuses and fuse holders shall be tamper-resistant, type "S," enclosed in dead front panels.

(t) Wiring Exposed to Weather. If outdoor wiring is exposed to moisture or physical damage, it shall be protected by rigid metal conduit, rigid nonmetallic conduit or liquid-tight flexible metal conduit.

(u) Grounding. Grounding of electrical and nonelectrical metal parts in a floating home shall be effected through connection to a grounding bus in the floating home distribution panel. The grounding bus shall be grounded through the green conductor in the supply cord or the feeder wiring to the service ground in the service entrance equipment.

(v) Overall Stability. The floating home shall be stable with both dead load and live load included.

(1) Metacentric Height. The metacentric height (MG) shall be equal to +1.0 foot or more according to the following equation:

(MG) equals Wsty/W - L

Where:

Ws	equals unit weight of sea water
W	equals total weight of floating home including dead load and live load (L.L. equals 20 pounds per square foot of first floor area and 10 pounds per square foot of second floor, habitable attic or loft.)
ty	equals moment of inertia of the area encompassed by the waterline around the hull or flotation (fully loaded boat) as taken about the longitudinal axis of the houseboat.
L	equals the distance between the center of the gravity and the center of buoyancy of the fully loaded boat.

(2) Freeboard. The freeboard as measured from the waterline to the top of the first floor or deck of the completed houseboat, including dead load but not live load, shall be at least 1.3 feet (with list angle equals 0.0).

(3) Stability with off-center loading; or wind loading. The floating home when subjected to either off-center loading or wind loading shall not exceed the limitations on hull immersions and angle of list set forth as follows:

(i) The maximum angle of list shall not exceed forty (40) degrees.

(ii) The freeboard shall be measured from the waterline to the top of the first floor or deck at side of the vessel at a point where said freeboard has its least dimension.

The allowable immersion shall not be more than two-thirds (⅔) of this freeboard. The off-center loading shall be considered as applicable to the completed houseboat, including dead load, and shall consist of a live load of one hundred (100) pounds, or five (5) pounds per foot of width, whichever is greater per lineal foot (first floor) and fifty (50) pounds, or two and one-half (½) pounds per foot of width, whichever is greater, per lineal foot (second floor, habitable attic, or loft). The uniform live load is to be applied halfway between the center of gravity and the outside edge of deck, to one side of the floating home at a time. The dividing line is the longitudinal axis of the vessel, and the overturning moment resulting from the off-center loading shall be taken about the computed center of gravity. Stability with the off-center loading applied shall be tested on both sides of the longitudinal axis.

Wind loading shall be applied to the completed houseboat, including dead load and live load, but not off-center loading. The moment due to the wind loading shall be computed at:

Mw equals PxAxH

Where:

Mw equals wind heeling moment, in foot pounds.

P equals wind pressure factor, in pounds per square foot in accordance with the following: 8.0 (for partially protected waters)

A equals area, in square feet, of the projected lateral surface of the vessel above the load waterline. This surface includes the hull superstructure and areas bounded by railings and/or structural canopies.

H equals height, in feet, to the center of area 9A) above the first floor deck.

(w) Calculations by Engineer. Calculations by a qualified engineer showing that the stability of the floating home conforms to the above minimum requirements will be acceptable. Said calculations shall be subject to the following provisions:

(1) With reference to paragraph v(a), Mg equals — 1.0 or more.

(2) With reference to paragraph v(c), calculations will show that a result of the list angle caused by the off-center loading, the original freeboard (with list angle equals 0.0 degrees) shall not be diminished by more than sixty-seven percent (67%).

(3) With reference to paragraph v(c), calculations shall show that:

Mr/M equals 10. Applied with a list equals 4.10 degrees or more.

MO equals overturning moment resulting from the off-center loading, said moment to be taken about a longitudinal line passing through the computed center of gravity of the floating home.

MR equals resisting moment due to buoyancy, said moment to be taken about a longitudinal line passing through

And:

Mr/Mw equals 1.0′ or more applied with a list equals 4.0 or more.

where:

Mw equals wind healing moment.

Mr equals resisting moment due to buoyancy (same as Mr above).

(x) Compartmentation and Floatation.

(1) Bulkheads. Watertight pontoons, floats or any other device to keep the floating home afloat shall be fitted with transverse and/or longitudinal watertight bulkheads which provide compartmentation sufficient to keep the fully loaded vessel afloat with positive stability, with any one main compartment flooded.

For pontoon type flotation, the maximum allowable distance between bulkheads is eight feet zero inches (8′ 0 ″). No single compartment shall comprise more than twenty percent (20%) of the total available flotation volume.

(2) Hull Type Flotation. The hull shall be fitted with at least one (1) longitudinal head and two (2) transverse bulkheads. No compartment shall comprise more than twenty percent (20%) of total available flotation volume. Hull type flotation with less than two (2) transverse bulkheads may be utilized upon demonstration that the structure will remain afloat with one (1) compartment flooded. If construction materials are utilized which make the possibility of rupture of the hull extremely remote, the county may waive this requirement.

(3) Flotation Devices. The external surfaces of all flotation devices shall be watertight and thoroughly protected from corrosion from salt water, solvents and weather. Flotation devices shall be constructed so that access to each compartment is readily available from the first floor level of the completed floating home. Flotation devices shall be structurally sound and securely fastened to the main houseboat structure as approved by the officials.

(4) Bilge Pump. Where permanent type of flotation, such as styrofoam or plastic foam is not provided, a portable bilge pump shall be maintained in proper working order. Bilge pump size and installation shall be approved by the building inspection division. Bilge pump shall discharge into sewer in an approved manner.

(5) Cross Connection. A cross connection is any connection or arrangement, physical or otherwise, between a potable water supply system and any plumbing fixture or any tank, receptacle, equipment or device through which it may be possible for nonpotable, used, unclean, polluted and contaminated water, or other substances to enter into any part of such potable water system under any condition. Cross connections are prohibited.

(y) Fire Prevention. Each floating home shall maintain, on board, at least one ten (10) pound (or equivalent) all purpose dry chemical fire extinguisher for each separate level of floor of habitable living space.

(z) Life Saving Equipment. Suitable accessible storage shall be provided on deck for the storage of life preservers, and life buoys or other coast guard approved life saving devices.

(aa) Garbage Disposal. No garbage as defined in this code shall be discharged overboard, but shall be contained in a rodent and leak-proof container with a tight-fitting cover and disposed of in an approved refuse disposal site.

(bb) Occupancy Permits. All owners of floating homes moored in Sonoma County shall apply for and obtain an occupancy permit prior to occupancy. Following the inspection of a floating home for an occupancy permit, the owner will be advised of any deficiencies that must be corrected and of applicable building permits that may be required.

(cc) Restrictions. It shall be illegal to inhabit, occupy, moor, lease, rent or sell any floating home which does not comply with the provisions of this chapter.

(dd) Household Occupancy Permits, Form, Fee. All applications for occupancy permits shall be in writing on a form supplied by the Sonoma County health department and shall be accompanied by the required fee.

(ee) Contents of Applications. All applications shall, as nearly as possible, contain the following information:

(1) The size, type and location of the vessel for which the permit is sought;

(2) The number of people to be accommodated on board;

(3) All provisions that have been made for disposal of sewage by connection to an approved shore-side sewage disposal system;

(4) All provisions that have been made for connection of shore-side utilities;

(5) Such other information as the director of permit and resource management department may deem necessary to effectuate the provision of this section.

(ff) Issuance. If the director of permit and resource management department, after investigation, determines that suitable provisions have been made for the disposal of sewage and connection of shore-side utilities, and that occupancy of the vessel for which the permit is requested will not create a hazard to health, welfare or safety of the occupants thereof or the community in general, he shall issue a permit. All permits may be made subject to such conditions as the director of permit and resource management department deems appropriate to insure compliance with the provisions of this section.

(gg) Posting. Permits shall be permanently posted and maintained upon the vessel in a conspicuous location.

The registration number of the occupancy permit shall be affixed to the vessel in letters and numbers four inches (4″) in height and clearly visible in the vicinity of the main entrance.

(hh) Term—Renewal. All permits issued hereunder shall be effective for a period of one (1) calendar year, provided however, that any material change in the conditions shown upon the application or any change in ownership or location of the vessel shall revoke the permit. Permits may be renewed by resubmission of an appropriate application and payment of fees.

(ii) Inspections—Revocation. The director of permit and resource management department shall have authority, with the owner's consent, to board and/or inspect any vessel when he has reasonable cause to believe that the vessel is occupied in violation of the provisions hereof. The director of permit and resource management department shall have the right to order the floating home vacated within ten (10) days and shall have the right to revoke any permit granted hereunder in the event that he ascertains that the permittee, or any occupant of the vessel, is acting in contravention of any of the provisions hereof, or if it is deemed to be a substandard floating home.

(jj) Appeal. In the event that any applicant or permittee is for any reason dissatisfied with the action of the director of permit and resource management department by reason of failure to grant a permit, the order to vacate, revocation of a permit, or imposition of any conditions relating to the permit, the applicant or permittee shall have the right to appeal to the board of supervisors, in writing, within ten (10) days after notification of action of the health officer. Upon receipt of an appeal the board of supervisors shall call a hearing within thirty (30) days from receipt of the appeal and give the applicant notice thereof by registered or certified mail addressed to the appellant at the address shown on the application or permit. At the conclusion of the hearing, the board of supervisors shall render a decision, which decision shall be final.

(kk) Approval by Permit and Resource Management Department. No permit shall be issued until the Sonoma County permit and resource management department has determined that the vessel for which the application is made substantially complies with the provisions contained in this chapter of the code of the county of Sonoma. (Ord. No. 5167 § 1(l), 1999; Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-18. Local conditions.

The above codes are performance codes intended to fulfill the requirements of local conditions which is some cases require higher stresses and design standards than the stated minimums. Local conditions such as twenty (20) pounds per square foot wind loads. Zone 4 for seismic design, flood zone requirements, geologic conditions, weak soils, saturated soils and expansive soils, may require alternate construction substantiated by calculations or suitable investigations, and may require special methods of construction. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-19. Definitions.

Whenever any of the following names or terms are used herein or in any of the codes adopted by reference by this chapter, unless the context directs otherwise, such names or terms so used shall have the meaning ascribed thereto by this section as follows:

(a) "Building official," "chief building official," "chief electrical inspector," "administrative authority" and similar references to a chief administrative position shall mean the director of permit and resource management department of the county of Sonoma; provided, however, that where such terms are used in conjunction with those duties imposed upon the public health officer, and terms shall mean the public health officer of Sonoma County.

(b) The "building division," "electrical division" or "plumbing division" shall mean the permit and resource management department of the county of Sonoma.

(c) "City" shall mean the county of Sonoma when referring to a political entity, or an unincorporated area of said county.

(d) "City clerk" means "county clerk and/or ex-officio clerk of the board of supervisors."

(e) "City council" or "mayor" means the board of supervisors of the county of Sonoma.

(f) "Board of appeals" shall mean the board of building appeals provided for in Section 7-3 of this chapter.

(g) "California Building Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 2, 2001 California Building Code, which incorporate by adoption the 1997 edition of the Uniform Building Code of the International Conference of Building Officials, with necessary California amendments.

(h) "California Code for Building Conservation" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 10, 2001 California Code for Building Conservation, which incorporate by adoption the 1997 edition of the Uniform Code for Building Conservation of the International Conference of Building Officials, with necessary California amendments.

(i) "California Building Standards Administrative Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 1, 2001 California Building Standards Administrative Code, which incorporate by adoption the 1996 edition of the Uniform Administrative Code of the International Conference of Building Officials, with necessary California amendments.

(j) "California Electrical Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 3, 2001 California Electrical Code, which incorporate by adoption the 1999 edition of the National Electric Code, with necessary California amendments.

(k) "California Energy Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 6, 2001 California Energy Code, which incorporate by adoption the 1997 edition of the Model Energy Code of the International Code Council, with necessary California amendments.

(l) "California Fire Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 9, 2001 California Fire Code, which incorporate by adoption the 2000 edition of the Uniform Fire Code of the International Fire Code Institute, with necessary California amendments.

(m) "California Historical Building Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 8, 2001 California Historical Building Code.

(n) "California Mechanical Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 4, 2001 California Mechanical Code, which incorporate by adoption the 2000 edition of the Uniform Mechanical Code published by International Association of Plumbing and Mechanical Officials, with necessary California amendments.

(o) "California Plumbing Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 5, 2001 California Plumbing Code, which incorporate by adoption the 2000 edition of the Uniform Plumbing Code published by the International Association of Plumbing and Mechanical Officials, with necessary California amendments.

(p) "California Referenced Standards Code" means the regulations adopted by the California Building Standards Commission in California Code of Regulations, Title 24, Part 12, 2001 California Referenced Standards Code.

(q) "Uniform Administrative Code Provisions for the National Electrical Code" means the Uniform Administrative Code Provisions for the National Electrical Code, 1996 edition, published by the International Conference of Building Officials.

(r) "Uniform Building Code Volume 3" means Volume 3 of the Uniform Building Code, 1997 edition, published by the International Conference of Building Officials.

(s) "Uniform Building Security Code" means the Uniform Building Security Code, 1997 edition, published by the International Conference of Building Officials.

(t) "Uniform Code for the Abatement of Dangerous Buildings" means the Uniform Code for the Abatement of Dangerous Buildings, 1997 edition, published by the International Conference of Building Officials.

(u) "Uniform Housing Code" means the Uniform Housing Code, 1997 edition, published by the International Conference of Building Officials.

(v) "Uniform Swimming Pool, Spa and Hot Tub Code" means the Uniform Swimming Pool, Spa and Hot Tub Code, 2000 edition, published by the International Association of Plumbing and Mechanical Officials. (Ord. No. 5374 § 1(b), 2002; Ord. No. 5167 § 1(m), 1999: Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-20. Examination of codes.

One (1) copy of each of the codes adopted by reference in this chapter have heretofore been filed with the clerk of the board of supervisors and shall be maintained for use and examination by the public in the office of the clerk of the board of supervisors. (Ord. No. 4906 § 3 (part), 1995.)

Article III. Penalties, Violations and Abatement.

Sec. 7-21. Penalties.

(a) The director of permit and resource management department and the director's authorized agents and/or employees are authorized to issue citations for violation of any regulatory provisions of this chapter.

(b) Any person, firm or corporation or agency, or employee of any person, firm or corporation or agency who violates or knowingly permits violation of any regulatory provision of this chapter shall be guilty of a public offense. The first and each subsequent conviction shall be a misdemeanor and shall be punished by a fine of not more than one thousand

dollars ($1,000.00) or by imprisonment in the county jail for not more than six (6) months, or by both such fine and imprisonment. Each person, firm or corporation or agency or employee thereof shall be guilty of a separate offense for each day, or any portion thereof, during which any violation of this chapter is committed, continued or permitted and shall be punished accordingly.

(c) Every violation of any regulatory provisions of this chapter is declared to be a public nuisance and the district attorney or county counsel of Sonoma County shall take such action as he may deem necessary to abate the same. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-22. Severability.

If any section, subsection, sentence, clause or phrase of this chapter is for any reason held to be unconstitutional or invalid, such decision shall not affect the validity of the remaining portions of this chapter. The board of supervisors declares that it would have passed this chapter and every section, subsection, sentence, clause and phrase thereof, irrespective of the fact that any one or more sections, subsections, sentences, clauses or phrases be declared unconstitutional or invalid. (Ord. No. 4906 § 3 (part), 1995.)

Article IV. Private Actions for Damage Caused by Unpermitted Placement of Fill Within Flood-Prone Urban Areas.

Sec. 7-30. Right to Institute civil proceedings.

Any person whose property is damaged by the unpermitted placement of fill within a flood-prone urban area, may institute a civil proceeding for injunctive relief, money damages and whatever other relief the court deems appropriate. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-31. Relief to be granted.

In any action hereunder, relief shall be granted upon a showing of damage to property which results from unpermitted placement of fill within a flood-prone urban area, for which a grading permit is required pursuant to Section 7-13 of this code. (Ord. No. 4906 § 3 (part), 1995.)

Sec. 7-32. Attorney's fees to be awarded.

Upon motion, a court shall award reasonable attorney's fees to a successful party who brings an action hereunder. The remedy available under this article shall be in addition to any other existing remedies which may be available. (Ord. No. 4906 § 3 (part), 1995.)

ATTACHMENT 7
Permit and Resource Management Department
VISUAL ASSESSMENT GUIDELINES

PURPOSE

The purpose of this administrative procedure is to provide guidelines for the assessment of visual impacts in the preparation of Initial Studies and Environmental Impact Reports.

GENERAL

These guidelines provide procedures to guide staff and consultant's in preparing and analyzing visual impacts. While the analysis of visual impacts involves qualitative judgements, this procedure is intended to define a methodology that utilizes to the extent practicable, objective standards that can be described and utilized in a consistent manner.

PROCEDURE

To analyze the visual effects of a specific project the following procedures should be followed.

1. Determine Viewpoints and Characterize Environmental Setting

Project impacts will be analyzed by considering public viewing points. Public viewing points include public roads, public trails, and public parks. Other public gathering places may be considered on a case-by-case basis. Start with topographic maps and aerial photos. Follow up with a "windshield" survey of roads in the vicinity of the project to determine where the project would be most visible to the general public. Consider a variety of viewpoints, and not only the point at which the project is most visible. The "baseline" environmental setting of viewpoints should be discussed in terms of existing physical features, as well as applicable regulations pertaining to development and scenic resources.

2. Prepare Photos to Illustrate Visual Impacts

Photographic analysis is required to evaluate potential visual impacts. Architectural renderings can be used for design considerations, but are discouraged in visual impact analysis because they tend to soften the effects. The visual impact analysis focuses on the mass, scale and contrast of the structure in relation to its surrounding.

A. For smaller projects, staff shall coordinate with the applicant to construct story poles, or tethered balloon clusters that accurately represent the height and location of the project. The story poles or balloon tethers should be marked at 5-foot intervals to provide a reference scale on the photos. In some instances a notice to the area residents describing the purpose for the story poles should be provided and/or site visit should be arranged for the decision-making body.

Take photos of the site from the various viewpoints identified in Step 1, or require the applicant's representative or consultant to provide photos taken from the selected viewpoints along with a site plan illustrating the location and height of each story pole and the viewpoints for the photos. If telephoto photos are to be taken, be sure that a similar photo is taken that represents the view seen by the human eye. A 360 degree panoramic view, taken from where the project will be located, is helpful to convey the surrounding landscape.

The photos should be marked by outlining the proposed structure using the story poles or balloons as a guide for the roof line and corners of the structure. In some instances, offsite views may be at such a distance, that the balloons or story poles are not readily apparent in the photos without the use of a telephoto lens – include both telephoto and normal eye view in these instances may be needed to illustrate the structure.

B. For more complex projects, a digitized photo simulation may be required. The following tasks are appropriate for visual assessments prepared by consultants:

1. Photograph site from viewpoints determined in Step 1 above. Verify site photography locations on field maps for use with computer model of the proposed project. Delineate additional field references to help verify the computer modeling and viewpoint locations.

2. Prepare baseline photographs from selected viewpoints for the simulations.

3. Develop plan and section figures describing the visual conditions within the project viewshed.

4. Produce a 3D realistic computer model of the proposed project using topographic, architectural and landscape drawings of project. Use AutoCAD or other appropriate software to develop the 3D terrain and architectural aspects of the model.

5 Additional simulations may be done to illustrate the effect of mitigation from landscape screening growth at 5- or 10-year intervals following construction.

6. Apply the proposed building materials and paint colors to the model and render, duplicating the view angle, distance, lighting conditions and time of year in the existing conditions photograph. Use existing elements in the baseline photograph as control points to register the model to the photograph. Repeat for each viewpoint.

7. Verify viewpoint accuracy using computer plot overlays on base photographs.

8. Digitize base photographs for each selected viewpoint.

9. Produce visual simulations that accurately show the proposed project ("before and after") for each selected viewpoint. The simulations should represent the mass, scale, density and proposed grading of the project. The computer simulation must include: all grading including roadways, driveways, landscape and parking areas and tree removal for required fire breaks; all structures and ancillary facilities; and landscaping at the time that construction is completed.

10. Analyze project impacts as described below.

3. Characterize the Site's Sensitivity

The visual sensitivity of the project site should be given a rating of low, moderate, high or maximum using the following criteria in Table 1.

Table 1
Site Sensitivity

Sensitivity	Characteristics
Low	The site is within an urban land use designation and has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by urban development or the site is surrounded by urban zoning designations and has no historic character and is not a gateway to a community. The project site terrain has slopes less than 20 percent and is not on a prominent ridgeline and has no significant natural vegetation of aesthetic value to the surrounding community.
Moderate	The site or portion thereof is within a rural land use designation or an urban designation that does not meet the criteria above for low sensitivity, but the site has no land use or zoning designations protecting scenic resources. The project vicinity is characterized by rural or urban development but may include historic resources or be considered a gateway to a community. This category includes building or construction sites with visible slopes less than 30 percent or where there is significant natural features of aesthetic value that is visible from public roads or public use areas (i.e. parks, trails etc.).
High	The site or any portion thereof is within a land use or zoning designation protecting scenic or natural resources, such as General Plan designated scenic landscape units, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for the community or scenic corridor. This category includes building and construction areas within the SR designation located on prominent hilltops, visible slopes less than 40 percent or where there are significant natural features of aesthetic value that are visible from public roads or public use areas (i.e. parks, trails etc.). This category also includes building or construction sites on prominent ridgelines that may not be designated as scenic resources but are visible from a designated scenic corridor.
Maximum	The site or any portion thereof is within a land use or zoning designation protecting scenic resources, such as General Plan designated scenic landscape units, community separators, or scenic corridors. The site vicinity is generally characterized by the natural setting and forms a scenic backdrop for a designated scenic corridor. This category includes building or construction sites within the scenic resource designation on or near prominent ridgelines, visible slopes greater than 40 percent or where there are significant natural features of aesthetic value that are visible from a designated scenic corridor.

4. Determine Visual Dominance

The visual dominance of the project is determined comparing the contrast of the following elements or characteristics of the project with its surroundings and giving a rating of inevident, subordinate, co-dominant, or dominant:

- Form: shape, geometry, complexity
- Line: the edge of the shape, boldness, complexity of silhouette, orientation
- Color: reflectivity, hue (actual color), value (dark or light)
- Texture: surface characteristics, randomness, grain (fine or coarse)
- Night Lighting

Based on the criterion listed above, define the visual dominance of the project as described in Table 2.

Table 2
Visual Dominance

Dominance	Characteristics
Dominant	Project elements are strong – they stand out against the setting and attract attention away from the surrounding landscape. Form, line, color, texture, and night lighting contrast with existing elements in the surrounding landscape.
Co-Dominant	Project elements are moderate – they can be prominent within the setting, but attract attention equally with other landscape features. Form, line, color, texture, and night lighting are compatible with their surroundings.
Subordinate	Project is minimally visible from public view. Element contrasts are weak – they can be seen but do not attract attention. Project generally repeats the form, line, color, texture, and night lighting of its surroundings.
Inevident	Project is generally not visible from public view because of intervening natural land forms or vegetation.

5. Determine Significance of Visual Impacts

The determination of visual impact significance is made by:

a. Establishing the level of visual sensitivity of the site using the criteria discussed Table 1.

b. Characterizing the visual dominance of the project in terms of its form, line, color, texture, and lighting as described in Table 2.

c. Determining significance of the visual impact by comparing site sensitivity with visual dominance of the project in accordance in Table 3.

Table 3
Thresholds of Significance
for
Visual Impact Analysis

Sensitivity	Visual Dominance			
	Dominant	***Co-Dominant***	***Subordinate***	***Inevident***
Maximum	Significant	Significant	Significant	Less than significant
High	Significant	Significant	Less than significant	Less than significant
Moderate	Significant	Less than significant	Less than significant	Less than significant
Low	Less than significant	Less than significant	Less than significant	Less than significant

Submitted by: Marilee Montgomery, 152 Wilfred Avenue, Santa Rosa, CA 95407 707-588-9926

DEIS SCOPING COMMENTS, GRATON RANCHERIA CASINO PROJECT

NEPA/CEQA SCOPING QUESTIONS FOR A PROPOSED INDIAN CASINO IN ROHNERT PARK, CA

RECEIVED
MAR 1 0 2004
National Indian Gaming Commission
Region II, Sacramento, CA

"Congress ...declares that it is the continuing policy of the federal government, in cooperation with state and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic and other requirements of future generations of Americans." [42 U.S.C. 4331 (a)]

PROPOSED PROJECT & SITE

The site chosen by the Federated Indians of Graton Rancheria (FIGR) and Station Casinos for the location of their proposed casino is 360± acres on Stony Point Road, between Rohnert Park Expressway and Wilfred Avenue. If successful, the casino resort will include a 300 room hotel - the largest in Sonoma County - a full-service spa, five restaurants, an events center and a food court. The casino will feature 2,000 slot machines, 120 gaming tables and a large bingo facility.

1. COASTAL BARRIERS & PROJECT WETLANDS

1.1 Is the project located within a coastal barrier designated on a current FEMA flood map or Department of Interior coastal barrier resources map?

1.2 Are there drainage ways streams, rivers, or coastlines on or near the project site?

1.3 Are there ponds, marshes, bogs, swamps or other wetlands on or near the site?

1.4 Is the project located within a wetland designated on a National Wetlands Inventory map of the Department of Interior (DOI)?

1.5 Does the project comply with Executive Order (E.O.) 11990, Protection of Wetlands, which discourages federal funding of new construction or filling in wetlands and compliance is required with the wetlands decision-making process (§ 55.20 of 24 CFR Part 55). The applicant should use Part 55 published in the Federal Register on January 1, 1990 for wetland procedures).

2. FLOOD MANAGEMENT

2.1 Is the project located within a floodplain designated on a current FEMA flood map? (24 CFR Part 55).

Duplicate Submission
See M.M. 3/25/04

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

California Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812

re: OLF Cotati, Sonoma County, CA

Dear Sirs:

Enclosed you will find a copy of my letter to the U.S. Army Corps of Engineers regarding the formerly used defense site know as Outer Landing Field, Cotati. This base was used during W.W. II. It has been identified by USACE as being eligible for the clean-up program and its status is active.

The reports list "at least one 1000 gallon" underground gas/oil storage tank, as well as a gas distribution system, possible buried ordinance, and possible oil waste. I live approximately 500 yards from this facility, and I am concerned that no clean-up work is planned because of budget constraints.

I am also concerned by what the reports do *not* address. I am concerned that USACE has no mitigation planned for the contamination from the machine gun range, as I have reason to believe that the location of the firing range, which was also used until 1958 by the Sonoma County Peace Officers Association, is the current location of the Rancho Verde Mobile Home Park.

I am concerned that during and after the war, undocumented disposal of toxic substances may have been occurred on the Western perimeter of the base. It is a well-documented fact that such burials were routine after the war, and records either were not kept well, or not kept at all. Chemical weapons have been found buried on the perimeter of the Sonoma County Airport, which was the old Santa Rosa AAF base. This FUDS is considered highly contaminated.

Based on evidence I have in my possession, I have good reason to believe that the Western perimeter of the base was used for waste and refuse pits. It is of great importance that the possibility of burial pits for refuse and/or toxic waste be fully explored on the OLF Cotati site.

No mention is made in the USACE reports about soil and/or water testing. Therefore, it is of utmost urgency that your agency take immediate action to ensure that this site and the land surrounding it is fully studied. The site is heavily frequented by people, and even the undeveloped land is easily accessible. The property 200 to 500 yards outside the boundaries of the airstrip itself are in imminent danger of development, and there has been recent development on the site itself. Local residents rely on well water as their sole source of domestic water, and

the UG tank and/or other possible contaminants in the water supply and the soil may pose a hazard to human health in this area.

Your prompt attention to this matter will be very much appreciated. If you have any questions, or if I can be of any assistance at all, please feel free to call me at 707-588-9926.

Very truly yours,

Marilee Taylor Montgomery

/mtm
cc

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

Us Army Corps of Engineers, Sacramento Division
1325 J Street
Sacramento, CA 95814

re: Property Number J09CA7470/Cotati OLF, Sonoma County, CA

Dear Sirs:

I am writing in regard to the FUDS known as OLF Cotati, located in what is now Rohnert Park, CA. I have received some information under the FOI Act, and I have some further questions about the site as follows:

1) Where was the base's rubbish/waste burial site?
2) Why is no mention made in the reports about burial pits or wells used for the waste and refuse generated by the base?
3) Why is there no remediation plan for the lead contamination from the firing range?
4) Have residents within 500 yards of the site been notified of the hazardous conditions, and if so, when and how?
5) Has the County been notified of this hazard and if so, when and how?
6) Has the City of Rohnert Park been notified of this hazard, and if so, when and how?
7) Have the current owners of the base site and the properties surrounding it been notified of the hazard, and if so, when and how?
8) Has the Sonoma County Regional Water Quality Control Board been notified of this hazard, and if so, when and how?
9) Does USACE plan to locate the missing 74 acres mentioned in the documents?
10) Is there potentially more than one underground oil/gasoline storage tank on the property?
11) When will clean-up of this site begin?
12) What will the cost of clean-up be?
13) Is USACE aware that the properties immediately adjacent to and within 500 yards of the base's perimeters are under imminent threat of development? What notice will be provided to the owners of those properties regarding the hazards associated with this site?
14) Is USACE aware that further development of the base site has taken place since 1999?
15) With the existence of at least one UG oil/gasoline storage tank and a firing range, and with the fact that there are residences on and immediately adjacent to this property, as well as the widespread use of well-water as the primary source for domestic water in many of the residences surrounding this site, why hasn't USACE upgraded the hazard to the public from this site from level 4 to a higher level?
16) Has USACE advised the State of California Department of Toxic Substances with regard to this site, and if so, when and how?
17) Have residents of Rancho Verde Mobile Home Park been advised of the lead hazard, and if so, when and how?

19) At the end of W.W. II, chemical and other weapons and toxic material were buried throughout the Santa Rosa AAF base, now the site of the Sonoma County Airport. Such burials from this era were common and usually went unrecorded, as is the case at the Santa Rosa facility, where Lewiston and other toxic agents have been found. Has the USACE taken all possible measures to ensure there were no surplus, potentially toxic material buried on or near the OLF Cotati site at the end of W.W. II? If it has, what measures were taken, and what were the results?

19) Were any studies done regarding asbestos at this site, and if so, what were the results?

20) Were any studies performed for the following known toxic contaminants : aviation gasoline including Toluene (Methylbenzene); Chlorobenzene (Phenylchloride); Lindane; antifreeze; battery acid; diesel fuel; kerosene; waste oil and spilled oil; paint solvents and thinners; arsenic from lead and/or battery grids; selenium from relays, steel and copper, and vulcanized rubber; barium from vacuum tubes, copper, and spark plug alloys; cadmium from electrodeposited and dipped coatings on metals, and in alloys and machinery enamels; mercury, from thermometers, electrical apparatus, and mirror coating; silver, from electrical conductors, electrical contacts, and magnet windings; fuel filters; oil filters; phosphorus from tracer rounds; if so, what were the results?

21) How and where were such materials as listed in the questions above normally disposed of on the base?

22) Have soil and/or water samples been conducted both at the aristrip site itself and/or the surrounding area within 500 yards? If so, when were the tests conducted, and what were the results?

23) With regard to the matter of gas and/or oil underground tanks and/or gasoline distribution system, has a survey been conducted of the location(s) of any UG tanks, and if so, when, and what were the results? If such a survey has been conducted, and if the UG tank(s) have been located, what is the condition of the tank(s)?

As a resident of the area who lives within 500 yards of this FUDS, I am understandably concerned about the potential for contaminants in the soil and in my well water, especially in light of the GAO's recent report, which indicated that the DoD has consistently underestimated both the number and severity of toxic waste contamination at such sites, as well as the cost to remedy them. I would therefore appreciate a prompt response.

Thank you in advance for your anticipated cooperation. Should you have any questions, or if I can be of any assistance to you, please feel to contact me at 707-588-9926. After 2:00 p.m. is best.

Very truly yours,

Marilee Taylor Montgomery

/mtm

cc: California Department of Toxic Substances
California Water Resources Control Board

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

February 1, 2004

California Department of Toxic Substances Control
Attention: Site Mitigation & Brownfields Reuse Program
Post Office Box 806
Sacramento, CA 95812-0806

re: OLF Cotati, Sonoma County, CA

Dear Sirs:

Enclosed you will find a copy of my letter to the U.S. Army Corps of Engineers regarding the formerly used defense site know as Outer Landing Field, Cotati. This base was used during W.W. II. It has been identified by USACE as being eligible for the clean-up program and its status is active.

The reports list "at least one 1000 gallon" underground gas/oil storage tank, as well as a gas distribution system, possible buried ordinance, and possible oil waste. I live approximately 500 yards from this facility, and I am concerned that no clean-up work is planned because of budget constraints.

I am also concerned by what the reports do *not* address. I am concerned that USACE has no mitigation planned for the contamination from the machine gun range, as I have reason to believe that the location of the firing range, which was also used until 1958 by the Sonoma County Peace Officers Association, is the current location of the Rancho Verde Mobile Home Park.

I am concerned that during and after the war, undocumented disposal of toxic substances may have been occurred on the Western perimeter of the base. It is a well-documented fact that such burials were routine after the war, and records either were not kept well, or not kept at all. Chemical weapons have been found buried on the perimeter of the Sonoma County Airport, which was the old Santa Rosa AAF base. This FUDS is considered highly contaminated.

Based on evidence I have in my possession, I have good reason to believe that the Western perimeter of the base was used for waste and refuse pits. It is of great importance that the possibility of burial pits for refuse and/or toxic waste be fully explored on the OLF Cotati site.

It is of utmost urgency that your agency take immediate action to ensure that this site and the land surrounding it is fully studied. The site is heavily frequented by people, and even the undeveloped land is easily accessible. The property 200 to 500 yards outside the boundaries of the airstrip itself are in imminent danger of development, and there has been recent development on the site itself. Local residents rely on well water as their sole source of domestic water, and

the UG tank and/or other possible contaminants in the water supply and the soil may pose a hazard to human health in this area.

Your prompt attention to this matter will be very much appreciated. If you have any questions, or if I can be of any assistance at all, please feel free to call me at 707-588-9926.

Very truly yours,

Marilee Taylor Montgomery

/mtm
cc

OUTER LANDING FIELD - COTATI
Prepared by Marilee Montgomery
February 22, 2004

HISTORY: In 1943-44, the U.S. Navy bought land in what was then known as Cotati, as a satellite airfield for the Alameda NAS. The Site Survey Summary Sheet for DERP-FUDS Site No. J09CA7470, dated September, 1999, indicates that there were two parcels of land for this site: a 218.25 acre parcel located in what is now Rohnert Park, and which has been developed over the years for commercial and residential purposes, and a 74.85 acre parcel, the exact location of which is currently unknown. This 74.85 acres is mentioned several times in various USACE reports, memoranda, and reference lists.

According to a 1944 General Layout Map of the Cotati Air Facility, the site contained two runways, a control tower, fire and crash truck building, gasoline and oil storage, a small arms magazine and a machine gun range. Other sources of historical reference indicate there were also barracks on the property, and there was at least one underground (UG) storage tank. The 1944 U.S. Army/Navy Directory of Airfields described the landing field of the "Cotati OLF, Navy" as having two runways, with the largest being 4,000 feet long.

The types of planes and/or the operations conducted at this airfield during W.W.II are unknown, however, OLF Cotati had a Tower, something which was only built on busy airfields. One aviation historian has suggested that in all probability, there were hundreds of planes using this field every day. This is a reasonable estimate, since the building of OLF Cotati coincides with the build-up in the Pacific Theater.

As late as 1948, the Cotati OLF was still depicted on Sacramento Sectional Charts as an active Navy Field. In 1949, the same chart listed it as "Cotati (Navy)", although a memorandum from the commander of Naval Air Bases, 11th and 12th Naval District, stated the status of the Cotati OLF as "inactive", with some land being leased for agricultural purposes, and the old machine gun range being used by Sonoma County Peace Officer's Association under a permit from the federal government.

The field was declared excess in 1956. From 1957-58, Standard Oil's California Research Corporation licensed the facility from the government for fuel testing purposes. Another lease permitted the City of Santa Rosa to use the airfield for drag racing. Local oral tradition has drag racing occurring there as early as 1952.

In the 1950's, there was some use of the airstrip for civilian planes. The property was conveyed by the federal government to a private party in 1958.

THE FUDS PROGRAM: In 1983, the government, under the auspices of the U.S. Army, began a process of identifying what are known as Formerly Used Defense Sites (FUDS), for the purpose of evaluating possible toxic waste contamination of these sites and determining their eligibility for cleanup using the Department of Defense guidelines established for closing military installations.

To date, more than 9,000 potential FUDS have been identified. More than 90% have been evaluated for FUDS program eligibility. Only 30% of the eligible sites require further response action. The remaining 70% do not require further action. Of the 30% that require more action, over 4,000 sites have been identified. FUDS properties include sites with contaminants ranging from industrial waste such as fuels and cleaning solvents in

groundwater, those with ordnance and explosives, and those requiring building demolition and debris removal, including asbestos remediation.

These hazards are given the following classifications:

1. *Building Demolition and Debris Removal Projects:* Requires that conditions were inherently hazardous when the property was disposed of or transferred and these conditions must present a clear danger.

2. *Hazardous, Toxic and Radioactive Waste Projects:* Includes environmental response actions related to hazardous substances, pollutants and contaminants which conform to the requirements of the National Contingency Plan of CERCLA.

3. *Containerized Hazardous, Toxic and Radioactive Waste Projects:* Differs from hazardous, toxic and radioactive waste projects in that they are classified as short-term corrective actions as opposed to long-term corrective actions. Includes but is not limited to the following: underground storage tanks, aboveground storage tanks, transformers, hydraulic systems, investigative derived wastes, abandoning of inactive monitoring wells, etc.

4. *Ordinance and Explosive Waste Projects:* Includes environmental response actions for all forms of military munitions and chemical warfare material.

5. *Potentially Responsible Party, Including Third-Party Sites:* Includes projects where the Department of Defense may share potential CERCLA responsibility for the hazardous condition.

CURRENT STATUS OF SITE: According to the U.S. Army Corps of Engineers (USACE), Sacramento Division, the Outer Landing Field (OLF) Cotati was identified as a FUDS as early as 1996, and perhaps earlier. In 1999, the base was determined to be eligible for the FUDS mitigation program and was given the property number of J09CA7470. It's status is "active".

A Site Survey was conducted on June 11, 1999, by Betty Henkle and Steve Cowen of TechLaw, the company hired by the DoD to assess the property. They met with Hugh Codding, of Codding Enterprises, at the 218.25 acre site. When asked by the team, Mr. Codding denied any knowledge of a UG tank or tanks, or any ordinance being found. The team recommended, among other things, that ground radar be used to locate the tank(s), which the Army indicates is visible in an early aerial photograph, and that the surrounding soil be tested.

Three to four projects as defined by the Department of Defense ("DoD") have been identified on this site. Information obtained from the Government Accounting Office ("GAO") lists the site four times, with each listing carrying its own description of the hazards at the site: CON/HTRW (listed twice), HTRW, and OEW-R, which translate respectively to, "Containerized Hazardous, Toxic and Radioactive Waste" (CON/HTRW), "Hazardous, Toxic, Radioactive Waste" (HTRW), and "Ordinance and Explosive Waste" (OEW-R). No soil and/or water testing or remediation has been done, and according to USACE, Sacramento, there are no funds available for this project.

USACE and GAO records indicate that OLF Cotati has been declared a hazardous site which may pose a health hazard for humans; that no remediation has been performed to date; that no testing of soil or water has been done to date; that no effort has been made to locate the underground (UG) airplane fuel and/or oil tank (s) known to have been on the site; that no effort has been made to locate rubbish and/or waste and/or surplus

material burial sites; that no effort has been made to clean up the heavily contaminated firing range known to be on the site, including the phosphorus from machine gun tracer rounds; that no effort has been made to locate the UG fuel distribution system know to be on the site; and that no testing for additional known military toxic contaminants has been done.

POSSIBLE CONTAMINANTS ON THE OLF COTATI SITE:

1. LEAD: Lead is a high-density, toxic material that is difficult to dispose of safely. There is no known "safe" level of lead exposure for children. Complex geochemical processes affect lead mobility in soil. Metallic lead is not inert in the environment, and can be oxidized to more soluble forms. These forms determine the mobility of the lead at shooting ranges. The rate of oxidation and the type of the resultant products are highly variable and are site specific.

Once oxidized, lead can be precipitate in the form of hydroxides, sulfates, carbonates, and phosphates. Each one of these is soluble, and the solubility is controlled in large part by the site-specific water chemistry to which they are exposed. Acidic conditions will also result in substantial mobility. Complexation/chelation and transport of particulates that contain lead are complication factors that may have the effect of increasing the physical movement of lead.

In general, lead is much more soluble under acidic pH, and rainwater is generally acidic. It is important to bear in mind that the site in question is an area of Vernal Wetlands, with much of it under rainwater and/or saturated with rainwater for three to six months of the year, depending on the amount of rainfall and the length of the rainy season.

Note: simple measurements of lead concentrations in soil and sediment do not provide an accurate assessment of lead bioavailability or mobility.

LEAD FROM MACHINE GUN RANGE: Issues surrounding lead contamination at shooting ranges are well documented and include the mobility of the lead in surface water or groundwater and in soil. Firing ranges are considered to be the major source of lead contamination in this country. Throughout the United States, lead from outdoor shooting ranges is known to leach out, contaminating soil and groundwater. Many outdoor ranges have been forced to close as a result. The contaminated soil from these ranges has to be removed at great expense and disposed of as hazardous waste.

At the time during which the Cotati OLF shooting range was in use, a period of roughly fifteen years, ammunition was produced from materials containing lead; most ammunition is still produced in this manner. Using such ammunition in target practice leads to lead contamination issues.

Shooting ranges produce lead contamination of the soil in two ways: airborne and spent rounds. Spent rounds are mostly found in the earthen berms of a shooting range. The bullets behave in several ways when they strike the berm, including penetrating, agglomerating, smearing, and ricocheting. While most of the lead in these berms is intact bullets and large fragments, the very small particles of lead and lead compounds that are produced from the weathering of the particles is the source of most lead mobility.

The other source contamination is airborne lead, which, when released, falls to the earth. Airborne lead is produced in three ways: (1) conventional primers use a lead based material which, when ignited, releases lead into the air at the firing line. (2) when conventional leaded ammunition is fired, lead is vaporized from the end of the projectile, releasing more lead into the air. (3) when the projectile hits the berm, lead is released into the air. All of this airborne lead then falls to the ground, thus the contamination is not only at the berm, but also at the firing line and points in between. These airborne particles are quite minute, and as such, are more soluble than the larger particles of lead from bullet fragments.

It is unknown how many pounds of lead were deposited during the period the base was occupied by the military, or later, by the Sonoma County Peace Officers Association, however, some rough estimates may be made using some known facts. In a study done by David H. Edwards of Virginia Polytechnic Institute, the gross lead amount at the U.S. Forest Service Shooting Range in the Shenandoah National Forest was at least 90,000 pounds per year from the one to three million rounds fired per year. It is reasonable to expect that the use of the Cotati OLF shooting range by the Sonoma County Peace Officers Association produced a comparable amount of lead from spent rounds.

With regard to the machine gun range during W.W. II, a W.W.II-era machine gun was capable of firing from 500 to over 1,200 rounds per minute, depending on what type of weapon was being used. ***Every third round was a tracer round containing phosphorus.*** The volume of rounds fired could have resulted in excess of 1,000,000 pounds of lead per year from the machine gun range during the war era. Even limited use of a machine gun range can produce a high amount of lead deposit. For example, using the U.S. Forest Service model above, 3 million rounds = 90,000 pounds of lead, the following estimates can be determined:

1) 500 rpm x 4 hours per day =
   120,000 rounds per day x 200 days per year =
   24,000,000 rounds per year = 720,000 pounds of lead per year

2) 1200 rpm x 4 hours per day =
   288,000 rounds per day x 200 days per year =
   57,600,000 rounds per year = 1,728,000 pounds of lead per year

These estimates are extremely conservative. Nevertheless, even a limited use of the range by the military would have resulted in millions of pounds of lead over the two years that the base was active. Taken into consideration with the fact that the range was used by the Sonoma County Peace Officers Association for approximately ten years after the war ended, clearly, there is an urgent situation with regard to lead contamination at this site.

Note: According to Sgt. Gerald E. Vincent of the U.S. Army Corps of Engineers, Sacramento Division, records indicate that the machine gun range was located where the Rancho Verde Mobile Park is situated today. It is unknown what was done with the soil from the earthen berm and the earth of the shooting range in general.

LEAD FROM AIRPLANE AND/OR AUTOMOBILE FUEL: Tetraethyl lead additives to gasoline are highly toxic. This compound generally degrades in soil within a matter of months, so any organic lead currently in the soil is most likely in the form of mineralized ethyl lead breakdown products of tetraethyl lead. The toxicity of

these compounds is not known. Exposure to organic lead in surface soil presents a known public health hazard. High levels of organic lead have been identified at military airbases.

Apparently, aviation fuel and gasoline and/or diesel fuel was stored both above-ground and underground at this site. The condition or disposition of the storage tanks is unknown. It is unknown how many planes used the field each day, and how much airplane fuel and oil was stored at the facility. It is unknown how much leaded airplane fuel may have contaminated the grounds from plane crashes, fire drills, and fuel spills and/or dumping, nor is it known where such disposal, fire drills or accidental spillage may have taken place on the site.

It is unknown how the facility was used by the California Research Corporation, specifically, if automobiles crashed on the site, if fuel spills were released, or if fuel was disposed of at the site or if fuel was stored on site either underground or on the surface, nor is it known where such disposal, storage, or accidental spillage may have taken place on the site. California Research Corporation at that time engaged in, among other things, petroleum processing research; the company is now owned by Chevron. If gasoline with experimental additives were tested at the Cotati OLF site, it is not known what substances these fuels might have contained.

The same is true with the airfield's drag-racing era; the amount of contamination of the soil from crashes and re-fueling spills and/or disposal of fuel, oil, etc., and the location of same is unknown.

LEAD FROM LEAD-BASED PAINTS: It is unknown what contamination during the forties may have resulted from the common use of lead-based paint on military installations. It is possible that the ground itself may have been painted as camouflage, since this was done at some military airstrips during W.W.II. It is not known where any painting, disposal of paint, or accidental spillage of paint may have taken place on the site.

LEAD FROM DISCARDED BATTERIES: It is unknown what contamination may have resulted from indiscriminate and improper disposal of aircraft, automobile, and/or equipment batteries, nor is it known where any disposal of these items may have taken place on the site.

STUDIES OF LEAD CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF LEAD CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

2) CONTAMINANTS OTHER THAN LEAD:

CONTAMINANTS FROM AVIATION GASOLINE OTHER THAN LEAD: Known toxic contaminants of aviation gasoline include Toluene (Methylbenzene), which is toxic by ingestion, inhalation and skin absorption.

OTHER POSSIBLE CONTAMINANTS: Other possible contaminants might include, but are not limited to, the following: Chlorobenzene (Phenylchloride), found in Phenol, solvents, and pesticides; Lindane, an insecticide and fumigant; antifreeze, a poison; battery acid; diesel fuel, a toxin; kerosene; waste oil and spilled oil; paint solvents and thinners; arsenic, found in lead and copper shot and battery grids; selenium, found in relays, steel and copper, and as a vulcanizing agent for rubber. barium, found in vacuum tubes, copper, and spark plug alloys; cadmium, from electrodeposited and dipped coatings on metals, and in alloys and machinery enamels;

mercury, from thermometers, electrical apparatus, and mirror coating; silver, from electrical conductors, electrical contacts, and magnet windings; asbestos, widely used as insulation; fuel filters; oil filters; phosphorus from machine gun tracer rounds. It is unknown how many of these contaminents were present on the base.

BURIAL OF RUBBISH, WASTES, AND/OR SURPLUS MATERIAL AT THE SITE: It is unknown where the base's dump site was, although an aerial photograph of the site seems to indicate numerous "ground scars" marking the location of rather large burial pits, some of them connected by pathways. These ground scars are located just on the other side of the drainage ditch that borders the Rancho Verde Mobile Home Park on the West. A common-sense evaluation of the situation would suggest that this was the most probable location of any dump site(s) for the base, as it is unlikely that such disposal efforts would have taken place at the Eastern end of the base where the tower, access roads and out-buildings were located. It is possible that the 74.85 acres mentioned in military records may have included the property west of the mobile home park, and further study of that area is indicated.

It was also common practice during W.W. II for the military to dig "dry wells", eight to ten inches in diameter, in which they would dump all their solvents, oil, paint, paint thinners, etc. These would have been capped over with soil when they were full, or when the base was closed. The location of these dry wells, if any, are unknown.

At the end of W.W. II, chemical and other weapons and toxic material were routinely buried wherever the military had men, bases, camps, etc. Records of such burials were either poorly kept or not kept at all. The old Santa Rosa AAF base, now the site of the Sonoma County Airport, is heavily contaminated as a result of such activities; Lewiston and other toxic agents have been found buried at the site, and there is no record of these burials. We must ask ourselves if USACE taken all possible measures to ensure there were no surplus, potentially toxic material buried on or near the OLF Cotati site at the end of W.W. II.
It is unknown what contaminents might have been buried as part of the normal disposal protocol of that era, and it unknown where such burials may have taken place.

STUDIES OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

TOXICS TRAVEL: It is now a known fact that toxic waste contamination "travels" to the surrounding land and water sources. Without adequate disposal methods, the heavy metals, petroleum products, and distillates, etc., produced by this military installation were most likely emitted directly into the air, soil and water of the surrounding area. Current knowledge of the movement of toxic contaminants indicate that an area of up to 500 yards surrounding this FUDS may be contaminated, and extensive testing needs to be conducted at least within a five hundred yard radius to determine the extent of the contamination.

There is great potential for water contamination, complicated by the fact that the direction in which water moves is determined by underground structures, not the slope of the land. This would necessitate extensive off-site and

on site water tests. This is especially crucial as surrounding homes use wells as their only source of water. The Army should test all wells in the area, whether those wells are privately or publicly owned.

The UG tank or tanks need to located, and their condition needs to be determined. Given that the material used for the tank(s) was probably steel, we can reasonably assume that the tanks have deteriorated, and may have sent plumes of contaminants throughout the site and the surrounding land.

The land on which Rancho Verde Mobile Home Park sits is the site of the machine gun range, later used as a firing range by the Sonoma County Peace Officer's Association. This location must be considered heavily contaminated with lead and phosphorus. USACE must be required to conduct extensive soil and water tests on the site itself and the surrounding property at least up to 500 yards of the site.

The exact location of burial pits and/or dry wells used by this facility for disposal of waste material must be identified, and once found, those sites must be tested.

IMPACT OF TOXIC WASTE CONTAMINATION ON PROPOSED AND EXISTING DEVELOPMENT: According to The Army Times, tracking down the sources of toxic contamination and determining past waste-management practices (in the military) requires "...the patience of a historian, the skill of a detective, and the tenacity of a treasure hunter....". In the absence of any real, hard data from the DoD regarding the level of pollution at this site, it must be assumed at this point that the 218.25 acres of the airstrip itself and the unidentified 74.85 acres, as well as the surrounding land up to 500 yards are heavily contaminated from its use as a military installation, and the additional contamination from the use of the firing range by the Sonoma County Peace Officers Association.

There is a long time-lag between the dumping of a toxin and groundwater contamination, identification of a specific health issue, and an eventual study of the causal links to a toxic site. The effect of exposure to low levels of chemicals leaking into the air, soil and water from toxic waste sites has not been adequately studied.

The site in question was not extensively developed until the 1980's, long after this country had increased its awareness of pollution from toxic waste contaminants. Assuming that the City of Rohnert Park possessed the common knowledge of the time, it should never have allowed development on this site. Certainly, no further development should have been permitted once the Army identified the site as hazardous in 1999. But further development has taken place since 1999, and in fact, it is taking place now. The former Crusher Stadium, only yards outside the base perimeter, is currently being developed, and this development threatens the health of the public, as dust and particulates from the excavation and grading process may contain contaminants. The lack of oversight by the City of Rohnert Park in this matter would seem to represent a wanton disregard for public safety.

Three multi-unit residential properties, consisting of two mobile home parks and one large apartment complex, are located on the 218.25 acre site itself, and there are single-family homes within 500 yards of the site. Rancho Verde Mobile Home Park is certainly the most obvious risk, however, the residents of all the homes on or adjacent to the base are in jeopardy.

The site is adjacent to a state designated groundwater recharge zone. It is a flood plain. Even the health of the Russian River and the Laguna de Santa Rosa could be at risk from the heavy metals and other known and unknown contaminants that may have resulted from this base.

A recent GAO report to Congress regarding the DoD's FUDS program was highly critical of the fact that the Army has consistently underestimated both the levels of contamination and the cost and time necessary for the remediation at these FUDS. Therefore, it can be assumed that the OLF Cotati site may well be more contaminated than the Army has indicated to date. The Army's tendency to underestimate the dangers at these sites and the cost to clean them up may be the reason that there is no plan to clean up the firing range, that no extensive soil and water testing has been conducted, and that to date, the study of the site has been cursory at best.

In addition, the hazard rating for this site was not computed correctly:

1) On Page 2 of the RAC Worksheet contained in the Final Inventory Project Report, it is logical to assume that at least some flares were kept at this facility, yet the rating for this item is shown as "0", instead of "4"

2) On Page 5 of the Worksheet, the number of buildings within a two mile radius is shown as "16 to 25", with a Value of "3". In 1999, when this report was done, there were - and still are - thousands of residential and commercial buildings within a two mile radius, as that radius includes virtually the entire town of Rohnert Park, as well as Rural Residential areas to the South, West and North of the site. On the site itself there are two mobile home parks, a large apartment complex and commercial structures, all of which existed in 1999. This Hazard Value should be rated a "5".

3) On Page 7 of the Worksheet,, under "Site Dynamics", again, the rating is inaccurately assessed; by 1999, not only had the site already had been developed further, more development on and/or adjacent to the site was anticipated. In fact at least one residential apartment project is in the works for that site. The rating should be a "5", not "0".

These ratings changes result in an overall Hazard Probability of "31", not "20", as computed by TechLaw, thereby increasing the Hazard Probability from a level 4 to level 2, at the least.

Not taken into account in this Hazard Probability rating is the lead from the firing range. This highly-toxic contaminant, which is known to pose a hazard to human health, makes the potential for toxic contamination on and around this site **EXTREME.**

SUMMARY: Although the Army may have underestimated the contamination at this site, this community should not make the same mistake. This entire area and the surrounding property up to at least 500 yards should be considered contaminated. It is of extreme importance that measures should be taken to restrict the public's access to the properties involved and to prevent any development or sale or transfer of the suspect lands until further, extensive testing is done by the DoD, and any toxic waste contamination has been thoroughly mitigated.

FINAL
Inventory Project Report
Outer Landing Field, Cotati
Sonoma County, California
DERP/FUDS Site No. J09CA7470

Contract No. DACW05-95-D-0004
Task Order No. 0020

September 1999

Prepared For:

Department of the Army
Corps of Engineers
Sacramento District
1325 J Street
Sacramento, California 95814

Prepared By:

TechLaw, Inc.
300 Union Boulevard
Suite 600
Lakewood, Colorado 80228

Duplicate Submittal See M.M. 3/05/04

PILOT STUDY OF GROUNDWATER CONDITIONS IN THE JOY ROAD, MARK WEST SPRINGS, AND BENNETT VALLEY AREAS OF SONOMA COUNTY, CALIFORNIA

September 17, 2003

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Duplicate Submission
See M.M. 3/25/04

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

O.W.L. Foundation policy statement prepared by Ed Casey and Paeter Garcia,
Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, 16th Floor, Los Angeles, CA 90071 tel. (213) 576-1000

I. INTRODUCTION

An extremely large development project (Indian casino and hotel/retail center) is slated for an identified region of Sonoma County where groundwater supplies are already being critically overdrafted. *Clearly, a sufficient and sustainable water supply does not exist for the project*, particularly in light of the region's prevailing water crisis and the current and future water needs of local residents. For that reason alone, the project should not be allowed to proceed. However, the Casino project's sovereign status would make matters even worse. For instance, the project may seek to ignore state environmental protection laws and local water management efforts and, in the event of groundwater litigation, the project could unjustly obtain priority over longstanding water rights held and relied upon by local landowners, cities, water agencies, and the County.

For these and other reasons discussed below, the O.W.L. Foundation (Open Space, Water Resource Protection, Land Use) ("O.W.L.") urges that the Casino project should be denied.

II. BACKGROUND

O.W.L. is a non-profit organization headquartered in the community of Penngrove, Sonoma County, California. O.W.L.'s membership is comprised of residents throughout Sonoma County, including residents of Penngrove, who understand that immediate steps must be taken to avoid a disastrous outcome for one of their County's most precious resources – water – groundwater in particular.

Duplicate Submission
See M.M. 3/25/04

ENVIRONMENTAL
GEOLOGY
SERVICES
CONSULTING and PROJECT MANAGEMENT
1695 Willowside Road, Santa Rosa, CA 95401

March 3, 2004

Mr. Marvin Pederson
Attorney at Law
1815 5th Street, Suite 200
Santa Rosa, CA 95401

**RE: PRELIMINARY REVIEW
POTENTIAL HAZARDOUS MATERIALS IMPACTS
FORMER U. S. NAVY COTATI OUTER LANDING FIELD
AND DOWN GRADIENT AREAS
RHONERT PARK, CALIFORNIA**

To Whom It May Concern:

This review and letter has been prepared in accordance the request of Mr. Chip Worthington.

PURPOSE AND BACKGROUND

The purpose was to conduct a preliminary review of some of the readily available information regarding the site history of the former U. S. Navy Cotati Outer Landing Field (Cotati OLF). The focus of this preliminary review is on potential hazardous materials impacts at and adjacent to the Cotati OLF from past military activities, specifically with regard to the proposed casino development west of the Cotati OLF. State and local regulatory agencies should be aware of potential hazardous materials impacts to the area.

Previous military use of the site is of potential concern because of possible future development of parts of the Cotati OLF and down gradient areas. Past site use may have resulted in hazardous materials impacts that may adversely impact area residents during construction, and might have possible negative impacts to future occupants of developed projects. Additionally there is concern that potential environmental conditions could adversely impact workers during construction activities. Military activities at the Coati OLF may have potentially impacted adjacent and down gradient areas such as the proposed casino site and these potential impacts should be more clearly defined and remediated prior to development.

SCOPE OF WORK

For this preliminary review the scope of work was limited to the following:

1. Review background summary history prepared by Marilee Montgomery,

2. Review available stereo pair air photos of the site and area (June 12, 1956, AV222-03, frames 8 & 9, scale 1:24,000, and later years),

3. Review U. S. Army Corps of Engineers Memorandum to Vincent Del Greco from Mark C. Charlton, dated September 10, 1999

4. Review report on Cotati OLF by TechLaw, Inc. prepared for the U. S. Army Corps of Engineers, Sacramento District, dated September 1999.

SUMMARY OF FINDINGS

Based on the results of the above review it is our opinion that the Cotati OLF has the following characteristics:

- The Cotati OLF consisted of two parcels of land: a 218.25 acre parcel and a 74.85 acre parcel. The 218.25 acre parcel was apparently the main airfield, but the location of the 74.85 acre parcel has not yet been determined.

- The Cotati OLF was operated by the U. S. Navy from approximately 1944 through 1949 and the facility included two runways, a crash and fire truck building, barracks, a control tower, oil and gasoline storage, small arms magazine and a machine gun range.

- Fuel testing was conducted at the facility by Standard Oil of California from 1957 to 1958 after it was declared excess government property. Also in the 1950's and later it was used as for drag racing and sports car racing.

- In 1983 the U. S. Army began identify inactive military facilities to be evaluated for possible toxic waste and hazardous materials issues. Aproximatly 90% of these facilities known as Formerly Used Defense Sites (FUDS), have been evaluated for clean up eligibility. Issues of concern at FUDS depend on past site activities and include: fuels and solvents in ground water, buried explosives and ordnance, asbestos, dump sites and lead contamination. The Cotati OLF was identified as a FUDS by 1996 and in 1999 the former Navy base was determined eligible for the FUDS mitigation program.

- LawTech was retained by the U. S. Army Corps of Engineers to assess the property (referred to as the 216.95 acre parcel). Their report makes reference to an oil storage building, gasoline storage, a small arms magazine and a machine gun range located on the facility, and underground storage tanks. The report indicated two categories of remedial / clean up projects: OE - Evidence of ordinance storage. Recommends finding the locations of waste sites that may contain unexploded ordnance, and CON/HTRW - Evidence of underground gasoline storage tanks. Recommends locating tanks and testing soil for possible contamination. For some reason they did not discuss lead contamination impacts from the machine gun firing range.

- Analysis of stereo pair air photos of the Cotati OLF taken in 1956, some seven years after Navy operations show the runways, access roads, probable aircraft machine gun test range berm (near west end of runway), and remaining buildings / building pads. The property from the west end of the runways to Stony Point Road are pockmarked with numerous circular, crater like features, and this area contains a larger area of disturbed soil. Although the origin of these features is not known, they could be related to previous military activities such as waste disposal or ordinance disposal. These areas are down gradient from the runways and appear to be outside of the 218.25 acre parcel comprising the main Cotati OLF. This area might contain the previously referenced 74.85 acre parcel.

CONCLUSIONS

The U. S. Army Corps of Engineers records show the Cotati OLF site as a declared potential hazardous waste site which has been recommended for further exploration and possible remediation. The presence of the Cotati OLF has the potential to impact adjacent and especially down gradient property such as the area of the proposed casino development.

Although the amount of aircraft maintenance was performed at the site is not known, if chlorinated solvents were used (a common WW-II era practice in aircraft parts cleaning) both shallow and deep ground water resources could be impacted. These kinds of liquid hazardous wastes were typically disposed of in on site "dry wells".

To date no known effort has been made to locate the underground storage tanks (USTs) and determine their impacts to the local ground water. Underground fuel tanks from this era have a high potential to have leaked and caused contamination to the shallow ground water with compounds that include benzene, toluene, xylenes and ethylbenzne.

As with the USTs, no known effort has been made to locate possible buried unexploded ordinance, even though this has been recommended by the U. S. Army Corps of Engineers contractors.

The location of the machine gun range has not been verified or explored with regard to lead contamination. However our preliminary air photo review suggests there was a berm off the western end of the runways that may have been used for testing aircraft machine guns.

Because of the known and suspected hazardous materials characteristics of the Cotati OLF and its proximity to the proposed development to the west (including the proposed casino project) the U. S. Army Corps of Engineers in cooperation with the Sonoma County Environmental Health Division, the California Department of Toxic Substances Control, and the North Coast - Regional Water Quality Control Board should make it a priority to:

- Locate the USTs and explore the vertical and lateral extent of possible ground water contamination, especially with regard to benzene a significant constituent of gasoline and a known carcinogen. If present, this contaminant has the potential to impact existing and future water wells in the area and down gradient form the former USTs.

- Analyze soil and water samples for chlorinated solvents during the soil and ground water exploration for the USTs. This would be prudent since if present, chlorinated solvents could impact deeper ground water zones and impact the regional ground water resource. In addition further historical research, in conjunction with a soil gas screening survey should be done to determine locations of aircraft maintenance activities and identify related solvent waste disposal sites.

- Conduct the necessary research to locate/ verify the former machine gun range and undertake a through soil exploration and testing program. If this site is in the area of proposed future development there could be significant human health risks to construction workers and down wind residents due to lead dust exposure. Once the machine gun range is identified the area should be properly explored and sampled, and remediated before any development to mitigate this potential health risk. Based on the available information on the period of use of the range and the resulting amount of lead (as well as phosphorous from tracer rounds), remedial costs could be in the millions to 10's of millions of dollars, depending on the volume of soil and the area of dispersal.

- Conduct the necessary research to locate potential buried ordinance and remove and safely dispose of these materials if found. If these potential disposal sites are located in proposed development areas, they could pose a high risk to construction workers and subsequent facility occupants.

- The U. S. Army Corps of Engineers in conjunction with County and State agencies should make it a priority to conduct the necessary research to identify the locations of the reported and suspected hazardous materials impacts to the Cotati OLF, explore and define the extent of off site impacts to soil and ground water (deep and shallow) and conduct the necessary remediation. As development is encroaching on the undeveloped property in the area it would be prudent to locate and remediate any hazardous materials related to the former military activities as soon as possible. The time to conduct the needed research, investigation and possible remedaition could take a few to several years.

LIMITATIONS

This work has been performed in accordance with generally accepted environmental review practices for similar preliminary reviews conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

The scope of work performed to complete this preliminary information review was limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or wastes, we also must alert the reader that this review may not reveal hazardous materials releases that have occurred. Also, site conditions can change with time, and our assessment was not intended to predict future site and off site conditions. Because of the limited nature of this review, site history was developed based only on information provided and a review of limited government documents. This report is not a risk assessment and the Scope of Work provided does not include a determination of the extent of, nor the environmental or public health impact of, known or suspected hazardous materials or wastes.

It is understood by the parties hereto that the Client who has requested this review will use the report (in addition to other information) to provide information to local and state public agencies to assist those regulatory agencies in making decisions about development of property at and near the Cotati OLF. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of properties that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety.

CLOSURE

I trust the foregoing preliminary evaluation and opinions are sufficient for the State and County regulatory agencies to determine if they should, in the public interest, follow up on these environmental concerns. If you or the regulatory agencies involved have any questions, please give me a call.

Sincerely,
ENVIRONMENTAL GEOLOGY SERVICES

Marc W. Seeley, RG, REA-II
Principal Geologist

12-125

DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, CORPS OF ENGINEERS
333 Market Street, Room 923
San Francisco, California 94105-2195

27 SEP 1999

REPLY TO
ATTENTION OF:

CESPD-PM-R

MEMORANDUM FOR

Commander, U.S. Army Corps of Engineers, 20 Massachusetts Avenue, N. W., Washington, DC 20314-1000

Commander, U.S. Army Engineering Center, Huntsville, P.O. Box1600, Huntsville, Alabama 35807-4301

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

1. References:

a. Memorandum CEMP-RF, 17 Jan 1997, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Delegation of Preliminary Assessment of Eligibility /Inventory Project Report (PAE/INPR), Project Approvals to Division Commanders.

b. DERP-FUDS Program Manual, U. S. Army Corps of Engineers, Directorate of Military Programs, Division of Environmental Restoration, Washington, D.C., July 96.

c. CEMP-RF memorandum, 16 Oct 96, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Preliminary Assessment Funding.

2. The enclosed INPR for Outer Landing Field, Cotati is approved by SPD in accordance with Ref 1a, 1b, and 1c. The INPR is being forwarded to you for your information and appropriate action. The site has been determined to be eligible for DERP-FUDS.

CESPD-PE

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

3. This memorandum authorizes the OE (J09CA747001) and the CON/HTRW (J09CA747002) projects as recommended by the INPR, and assigns the CON/HTRW project to CESPK for their appropriate action. The OE project is referred to Huntsville Army Engineering and Support Center to determine the need for further action.

Encl

Thomas D. Hodgini, COL
PETER T. MADSEN
FOR COL(P),EN
Commanding

BettingMagazine Tuesday, March 09, 2004
Find this article at:
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Tribe Considers Alternate Casino Sites
Jul 12, 2003

Representatives for the Graton Rancheria tribe are actively looking at as many as a dozen alternate locations for their proposed casino in the face of continuing opposition to their Sears Point site.

Sonoma County officials confirmed that consultants working with the tribe are asking detailed questions about a number of areas along the Highway 101 corridor.

"They are looking at other sites for gaming facilities. They've gotten various land-use maps and other things from the county," said County Counsel Steven Woodside. Woodside declined to be more specific about the locations, other than to say the available plots of land are near Highway 101, between the Petaluma area and Santa Rosa.

"The logical place to look for sites that are consistent from a land use and general plan point of view, would be along the 101 corridor," Woodside said. "I think the tribe is interested in sites that are closer to the center of the Bay Area, rather than farther away."

He said tribal representatives have been discussing "the pros and cons of having the site closer to a city, or in a city." But it was uncertain Friday whether the tribe is backing away from its highly controversial choice at Highway 37 and Lakeville Road.

"I think they are sincerely considering other sites. As to whether other sites from their perspective will be better than the Highway 37 site remains to be seen," Sonoma County Supervisor Mike Kerns said.

Kerns said there isn't any obvious place to put a casino. In a one-sentence statement released Friday, tribal chairman Greg Sarris confirmed the tribe is complying with requests by Sen. Dianne Feinstein and other officials to look for alternate sites for a casino.

Woodside said the tribe is spending time and money exploring alternatives and doing environmental analysis The Graton Rancheria's plan to build a casino resort near Sears Point with the backing of a Nevada gaming corporation has run into a wall of opposition from county supervisors in Sonoma, Marin and Napa.

Reps. Lynn Woolsey, D-Petaluma, and Mike Thompson, D-St. Helena, and Feinstein recently introduced legislation that would subject the project to rigorous environmental review and make it more difficult for the tribe to develop any site it chooses.

County officials say the tribe may be recognizing the strength of the opposition and the need for community support. Indian tribes have sovereign rights and are not subject to local land use rules once their land is taken into federal trust for a reservation. Federal law allows tribes to develop gambling, although they are subject to the conditions set by the governor in a gaming compact.

Opponents say the project is ill-suited for the environmentally sensitive shore of San Pablo Bay with its limited water and wastewater capacity, and predict major traffic jams on an already busy Highway 37.

While Sonoma County supervisors are opposed to the Sears Point site, they also expressed a willingness to work with the tribe to explore other possibilities. Woodside said the tribe appears to be complying with the county's request to hold off on exercising remaining options on the 2,000 acres that Station Casinos Inc. is buying for the tribe, as well as applying to the federal government to hold the land in trust.

So far Station Casinos has paid $4.3 million for 321 acres of the Sears Point site, but has not consummated the remaining purchase of 1,679 acres. Rohnert Park officials have been in contact with the real estate development company representing the tribe about the possibility of finding land in the northwest area of the city for a casino site.

Last week, Rohnert Park officials said finding 200 acres for the tribe's reservation is a long shot, but a smaller project -- 20 acres for example -- is still possible. Woodside said it makes sense for the tribe to be discrete about new locations it is considering.

"They are reluctant to go public about this for good reasons," said Woodside. "They are concerned some alternatives might be priced out of their range, or things could happen to make it more difficult for them on alternatives they might find."

Previously, Sarris has said that as soon as landowners find out a tribe is interested in land, the selling price can double because owners know there is a prospect of lucrative gaming.

Although the congressional bill that restored the Graton Rancheria allows the tribe to establish a reservation in Marin or Sonoma counties, the tribe appears to be focusing on alternate sites in Sonoma County, where there is less anti-growth sentiment.

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Tribe looking at Petaluma sites for casino

August 13, 2003

By LOIS PEARLMAN and CHIP McAULEY
ARGUS-COURIER STAFF

A local Indian tribe is looking at alternative sites for a gambling casino as opponents to the plan released a study saying the casino would cause "irreparable" environmental damage if it is built on a proposed site along Highway 37.

Some of the alternative sites are reportedly in the Petaluma area.

The Federated Indians of the Graton Rancheria, a 558-member tribe that received its federal recognition in 2000, is planning to build a casino and resort on a 2,000-acre site at the junction of Highway 37 and Lakeville Highway near the shore of San Pablo Bay.

Tribal chairman Greg Sarris has said the facility would cover about 200 acres, and the rest of the property would be restored as wetlands or reserved as open space with public access.

But opponents, including 16 Northern California environmental organizations, say the tribe's preferred site is the worst possible place for a casino.

"It is hard to conceive of a more unsuitable or ecologically damaging site on which to locate a development of this nature and scale," is the conclusion drawn in a report released last month on the environmental impacts of the proposed development.

The report was prepared by the Bay Institute of Novato, the Sonoma Land Trust and the Sonoma Ecology Center. The Bay Institute and the Sonoma Land Trust are both involved in efforts to restore some 21,000 acres of former wetlands along San Pablo Bay that were drained and converted to farmland about a century ago.

Possible negative environmental effects of the casino cited in the study include: endangerment of over a dozen sensitive plant and animal species, conflict with county land use designations, encouraging more growth, loss of wetlands and other natural habitat, ground subsidence due to well drilling, increases in traffic, artificial light, noise and air and water pollution, and disruption of the contiguity of wetlands restoration efforts.

Although tribal members say the Highway 37 property is still its top choice, representatives of the tribe and its business partner, Station Casinos of Las Vegas, have been looking at several other properties.

Sonoma County Counsel Steven Woodside said his staff has prepared parcel-specific land use maps for the tribe for properties along the Highway 101 corridor from Rohnert Park south to the county line. The tribe is also looking at some sites in Marin County, he said.

Petaluma councilmember Mike Healy said representatives of the tribe had talked with him about several properties in the Petaluma area, including the KOA campground on Rainsville Road and the Petaluma Village Premium Outlets on Petaluma Boulevard North.

However, representatives for the two properties said they have not spoken with anyone about the casino proposal. Brad Stipe, director for Chelsea Properties which owns the Petaluma Village Premium Outlets, said his company had not been contacted by the tribe. Chris Wood, son of KOA campground owner Wayne Wood, said the tribe had made no contact with them.

The KOA is a 60-acre site bordered by several other tracts of land. Both properties are prone to flooding.

City officials said the current casino proposal includes:

2,000 slot machines

100 game tables

A 1,000- to 1,500-seat theater

A hotel with 200 to 300 rooms

Multiple restaurants and a lounge

Healy called the likely impacts of the project "ugly." He cited traffic and circulation problems and the land being in the 100-year flood plain as major issues. He speculated that a casino in Petaluma would mean "significant negative impacts to the character of the community."

Other local officials agreed with Healy. Petaluma Mayor David Glass said he would be "adamantly opposed" to efforts to locate any casino in Petaluma.

"It's not something I would choose for my family," he said.

Beyond environmental impacts, Glass criticized what he called the "sleazy elements" that he said go along with gambling, including drugs, increased crime rates and prostitution. Locating a casino in Petaluma, Glass said, would be "devastating to the quality of life in Petaluma." He said such a project could not be justified.

Glass urged that the tribe seek alternatives to providing for its future development, calling a casino in Petaluma "exploitation" of the community, the tribe, and current legislation.

Several other properties are on the list of possibilities, although no one was willing to disclose which sites the tribe is considering.

Woodside and his staff have been meeting with representatives of the tribe and Station Casinos at least once a week to address issues of land use, water, sewer and other concerns.

He said the tribe has agreed to "hold off" on exercising its purchase option on the Highway 37 property until it explores the other alternatives.

Under federal law, the tribe has to secure ownership of the land, then go through the process of having it declared a trust land. If the site is accepted as trust land, the tribe would have complete sovereignty over the property and would not have to comply with land use or environmental laws, or pay taxes.

However, the tribe has offered to pay the county up to $160 million ovr the first 20 years to cover the cost of services like firefighting and law enforcement.

Meanwhile, Rep. Lynn Woolsey, D-Petaluma, and Sen. Dianne Feinstein, D-California, have introduced legislation at the federal level which would subject the Graton tribe to stiffer regulations for any trust lands.

Under the Indian Gaming Regulatory Act of 1988, any tribe which was granted federal recognition after that date is able to acquire its first trust land without submitting to comprehensive environmental review. The Feinstein-Woolsey legislation would exempt the Graton tribe from the 1988 act.

Congress is currently in recess, and the legislation will be considered when it returns in September.

Woodside said he expects the tribe to make an announcement about a casino site "within the next month."

(Contact Lois Pearlman or Chip McAuley at argus@arguscourier.com.)

return to your story

MTM

Marilee Taylor Montgomery
152 Wilfred Avenue ~ Santa Rosa, California 95407

March 26, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
14411 L Street, Ninth Floor
Washington, DC 2005-3512

re: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

Enclosed is a supplemental report to the attachment entitled "Kleinfelder Report", which was included with my comments submitted at the hearing of March 10, 2004, in Santa Rosa, CA. This report, authored by Steven F. Carle, PhD, should be attached to my comments.

Thank you for your help, and once again, thank you for your patience and responsiveness when I've called you with my questions. Should you any questions about this letter or the material included, please call me at 707-588-9926.

Very truly yours,

M. Taylor Montgomery

Marilee Taylor Montgomery

Thank you!
Marilee

/mtm

cc

enclosure: Carle Report, 19 pages

RECEIVED
NATIONAL INDIAN
GAMING COMMISSION
2004 MAR 30 PM 4: 29

Steven F. Carle, Ph. D.
11001 Minnesota Ave.
Penngrove, CA 94951

November 4, 2003

Board of Supervisors
575 Administration Drive, Room 100A
Santa Rosa, CA 95403-2887

RE: Pilot study of Groundwater Conditions in the Joy Road, Mark West Springs, and Bennett Valley Areas of Sonoma County, California (The Kleinfelder Report)

Dear Sonoma County Supervisors,

I would like to share with you my comments on Kleinfelder, Inc.'s report on water scarce areas in Sonoma County, dated September 17, 2003. Immediately below, these comments are summarized. More detailed comments follow in the order of the report. "Appendix A" gives details on easily obtainable well data that Kleinfelder did not examine.

Sincerely,

Steven F. Carle, Ph. D.

SUMMARY OF COMMENTS

The Kleinfelder Report suffers two main problems (1) it deviates from the proposed scope of services, and (2) it deviates from basic hydrogeologic concepts by dwelling on a statistical analysis of "*depth to water trends*".

The following are deviations from the scope of services:

1. In data collection and assessment, Kleinfelder failed to collect data for two DWR monitoring wells in the Bennett Valley Study Area and 14 private water company wells in or very near Bennett Valley and Mark West Springs Study Areas. These data are easily accessible on the internet and, therefore, Kleinfelder failed to properly assess ease of data collection. (See Task Two and Task Six, item 3)
2. In relating geology and hydrogeology to water quality, Kleinfelder failed to utilize readily available water quality data from the 14 private water company wells mentioned above. (See Task Five, Technical Component; Task 6, item 5)
3. Kleinfelder did not provide any useful information on groundwater recharge. (See Task Five, Technical Component; Task 6, item 4)
4. Kleinfelder failed to assess how different entities affect each other's water availability. Specifically, Kleinfelder did not distinguish between residential usage by single-property wells and usage by private water company wells for subdivisions. Kleinfelder did not assess how usage for new developments, particularly residential subdivisions and golf courses, will affect water availability for prior users, primarily single residential units and agriculture. (See Task Five, Water Use Component)
5. Kleinfelder did not assess or address environmental constraints, such as maintaining flows in Salmon Creek and Mark West Creek, both recognized as salmonid habitat. (See Task Five, Future Demand Component)
6. Kleinfelder failed to assess changing land use in Mark West and Bennett Valley, particularly in the last decade, favoring residential subdivisions and golf courses. Kleinfelder examined no hydrology data from after 1992. (See Task Five, Land Use Component)

Kleinfelder deviated from basic hydrogeologic concepts by dwelling on a statistical analysis of "*depths to water trend*" for its primary technical contribution. This approach is fraught with errors related to:

- Topography (a major consideration for all three Study Areas),
- Development trends toward ridgetops,
- Changes in drilling technology facilitating deeper drilling,
- Trends from drilling shallow wells serving single properties to drilling deep high-capacity, public water supply wells serving subdivisions.
- Changes in land use, such as converting open space to golf courses (which Kleinfelder showed to be the largest groundwater users by far).

Kleinfelder should have focused on establishing change in water level elevations over time. Water level elevations, not depths, establish the volume of groundwater stored, which is crucial in the Joy Road area where the Wilson Grove Formation is perched on top of the Franciscan Formation. Water level elevations dictate the rate and direction of flow. If deep large capacity wells for golf courses and subdivisions drop water level elevations too much, shallow wells will go dry and summer creek flows will cease.

DETAILED COMMENTS

1. INTRODUCTION

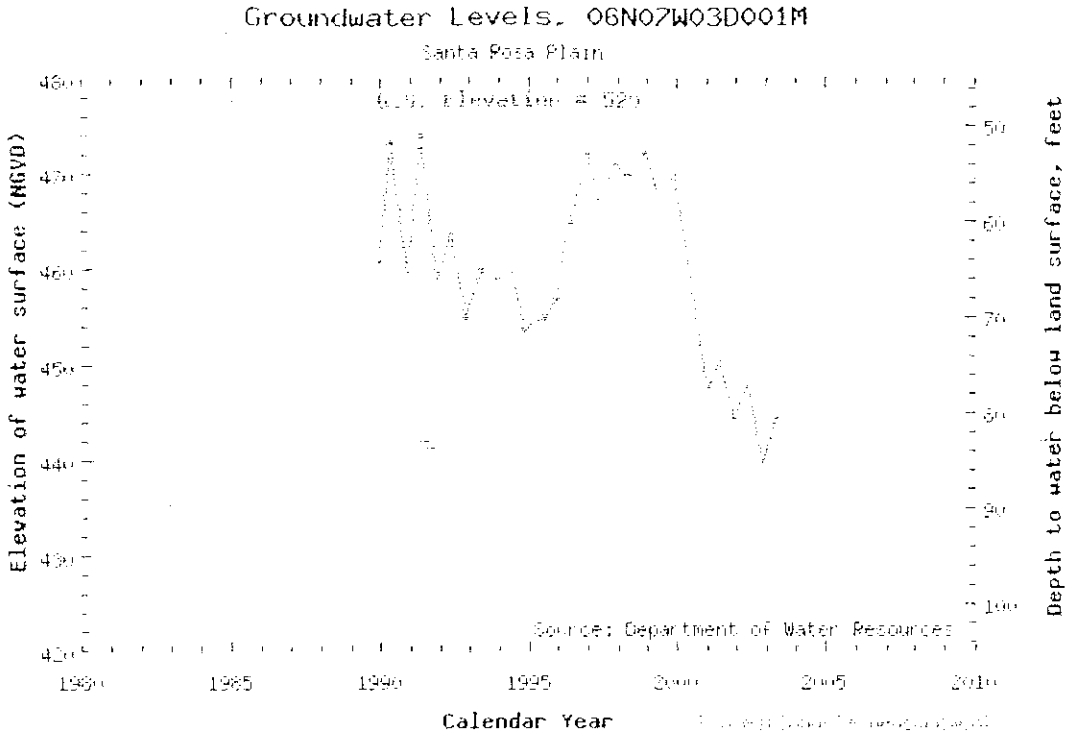
P. 3

"*However, there are no Department of Water Resources monitoring wells near the study areas...*"

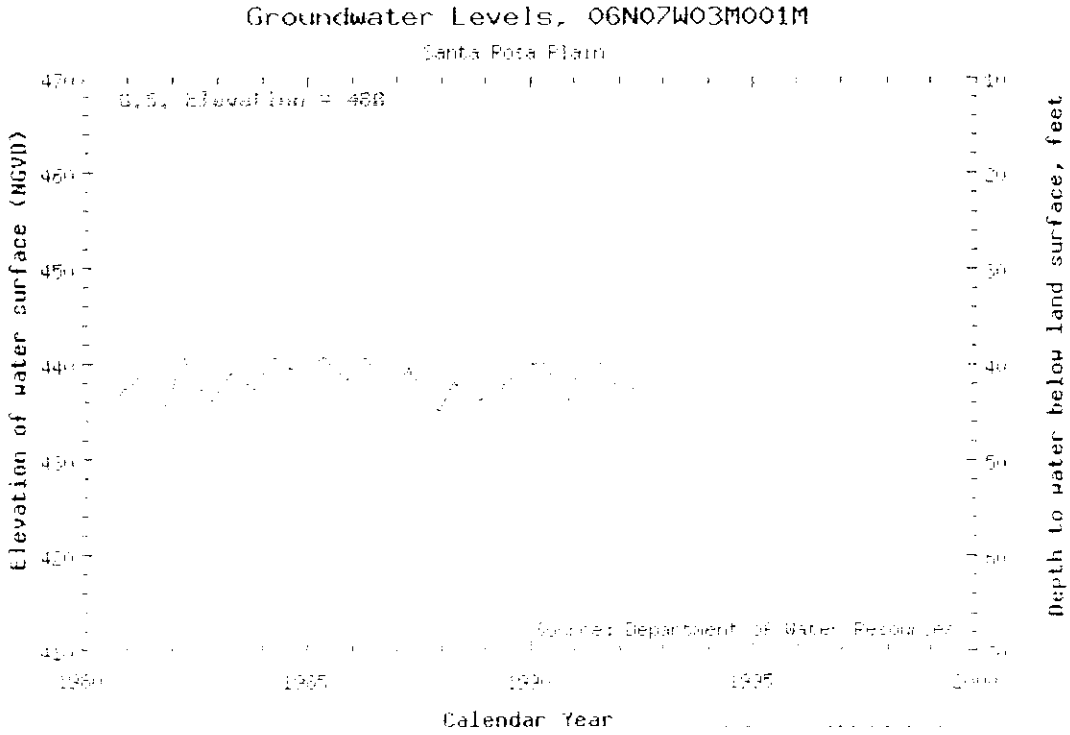
This statement by Kleinfelder is false! There are two (2) DWR monitoring wells within the Bennett Valley Study Area. Groundwater level and water quality information for these wells is easily obtainable through the DWR Water Data Library at this website:
http://wdl.water.ca.gov/gw/admin/main_menu_gw.asp

A map interface provides an easy way to find DWR monitoring wells:

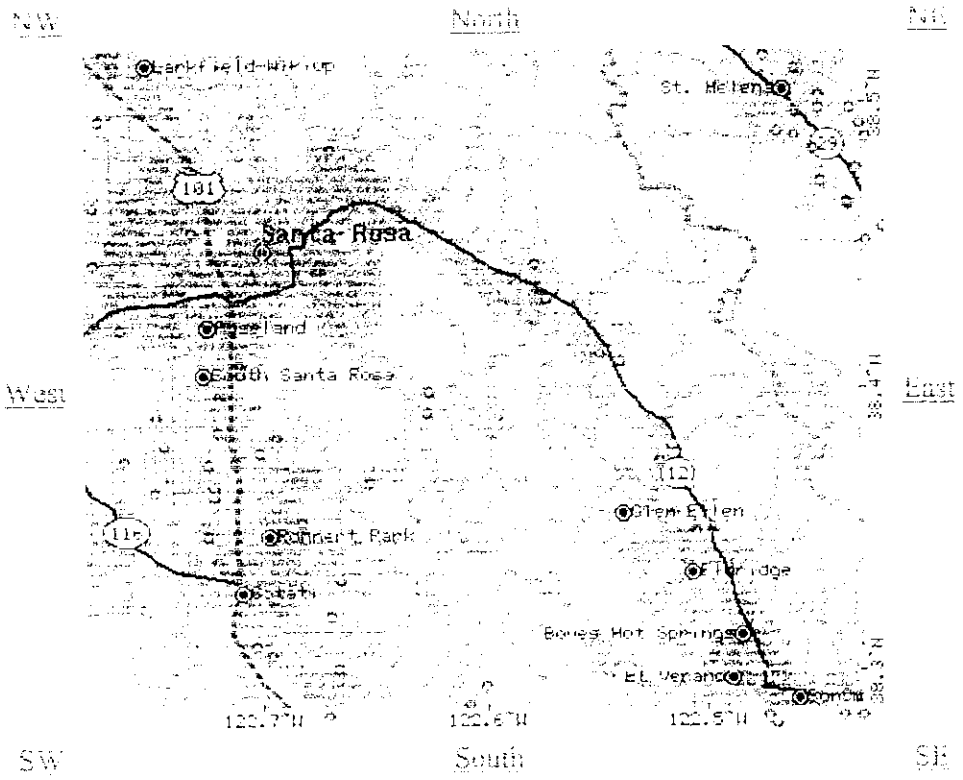
Instructions (Step 4 of 4)



Water level elevations in DWR well 06N07W03M001M appear stable over time. However, no water level data are available after 1992:



This map provides access to individual water well data. Click on one of the red symbols on the map below to retrieve a hydrograph and tabular listing of the data for that well. If no symbols appear on the map, then no water level data are available for that area. Data may also be obtained using our text interface.



Water level elevations in DWR well 06N07W03D001M indicate an approximate 30 foot water level decline between 2000 and 2003:

P. 3

"...monitoring of private wells is not required in Sonoma County so, unfortunately, no such data is available."

This statement is false. Water quality monitoring is required of private water companies that are public water suppliers. The California Department of Health Services (DHS) keeps records that are publicly accessible through the "Geotracker" web site:

http://www.geotracker.swrcb.ca.gov

I found water quality information for 6 public water supply wells in or near the Bennett Valley study areas and 8 public water supply wells in the Mark West Creek study area.

See Appendix A for a list of names and web addresses for these wells obtained from the Geotracker website.

2. JOY ROAD STUDY AREA

P. 9

"(52 to 156 million gallons)"

Incorrect conversion: should be "(52 to 104 million gallons)."

"Increase in water demand should be proportional to residential growth."

This statement should be qualified to assume similar residential water demand for new development." Much new development consists of luxury homes.

3. MARK WEST STUDY AREA

P. 18-19

There is no discussion comparing residential wells and public water company wells within the Mark West Study Area. Clearly, Kleinfelder did not investigate readily accessible information on private water companies, including how many customers these private water companies serve. See Appendix A. This topic should have been investigated as specified in "Water User Component, Task Five."

P. 21

Kleinfelder estimates golf course groundwater usage at 660 acre feet per year and residential groundwater usage at 269 acre feet per year for 537 households (p. 18). If up to 206 units can still be built (p. 19), residential water usage could rise to 372 acre feet based on Kleinfelder's estimated annual water consumption figures shown in section 3.18.

On p. 21, Kleinfelder states:

"Both (golf) courses are irrigated with well water; although, development plans call for use of reclaimed water from future homes to water the Mayacama course."

"...irrigation of the Mayacama course is expected to require about 330 acre feet per year.

Based on Kleinfelder's statements and figures, reclaimed water from future homes could irrigate only a small fraction (10-20%) of the Mayacama golf course, considering that much of residential water usage is devoted to outside irrigation and, for some residents, swimming pools.

Based on Kleinfelder's statements and figures, the Mayacama and Fountaingrove golf courses will continue to be the dominant groundwater users (approximately 660 acre feet per year) in the Mark West Study Area. As is, Kleinfelder implies that the golf course groundwater usage will be entirely replaced by reclaimed wastewater in the future.

P. 21-22

In Section 3.19 "CONSTRAINTS ON GROUNDWATER AVAILABILITY," no mention is made of the potential impacts of increased

groundwater extraction in the Mark West Study Area on stream flows in Mark West Creek. Mark West Creek is one of the few remaining tributaries to the Russian River that is known to support salmonid reproduction.

4. BENNETT VALLEY STUDY AREA

P. 25-27

Similar to the Mark West Study Area, there is no discussion comparing water supplies from residential wells and public water company wells within the Bennett Valley Study Area. Clearly, Kleinfelder did not investigate readily accessible information on private water companies, including how many customers the private water companies serve. See Appendix A. This topic should have been investigated as specified in "Water User Component, Task Five."

This topic of water supply differences between residential wells and private water company wells should have influenced Kleinfelder's discussion on "RESIDENTIAL LAND USE", "HISTORICAL RESIDENTIAL USE", "CURRENT RESIDENTIAL WATER DEMAND," and "HISTORICAL RESIDENTIAL WATER DEMAND," and "FUTURE RESIDENTIAL USE TRENDS". A centralized water supply makes obtaining water from deeper wells more economical. Furthermore, metering of water usage is typical for a private water company. Pumping from deeper private water company wells also may dry up shallower residential wells.

5. STATISTICAL EVALUATION OF WELL LOG DATA

P. 32 (DATA SET PREPARATION)

No effort was made to determine water level elevation. This is a fundamental error. Depth to water is the wrong parameter to analyze in a hydrogeologic study.

Water level <u>elevation</u>, not depth, should have been studied.

BENNETT RIDGE MUTUAL WATER COMPANY (SANTA ROSA)
WELL 02
State Well Number: 4900585-002
[illegible]

MATANZAS CREEK WINERY (SANTA ROSA)
Well 01
State Well Number: 4901248-001
[illegible]

SONOMA MOUNTAIN COUNTY WATER DISTRICT (SANTA ROSA)
WELL 01
5438 ALTA MONTE DR
SANTA ROSA, CA 95404-9728
State Well Number: 06N/07W-16C02 M
[illegible]

SONOMA MOUNTAIN COUNTY WATER DISTRICT (SANTA ROSA)
WELL 02
State Well Number: 4900580-002
[illegible]

SUMMIT VIEW RANCH MUTUAL WATER CO (SANTA ROSA)
WELL 01
State Well Number: 06N/07W-15K02 M
4100 SUMMIT VIEW RANCH RD
SANTA ROSA, CA 95404-9562
[illegible]

MARK WEST CREEK

HEIGHTS MUTUAL WATER COMPANY (SANTA ROSA)
WELL 01A
State Well Number: 4900612-002
[illegible]

HEIGHTS MUTUAL WATER COMPANY (SANTA ROSA)
WELL 02
State Well Number: 4900612-003
[illegible]

Unconfined and Confined Aquifers

In most depositional environments, coarser-grained deposits are interbedded with finer-grained deposits creating a series of aquifers and aquitards. When a saturated aquifer is bounded on top by an aquitard (also known as a confining layer), the aquifer is called a confined aquifer (Figure 14). Under these conditions, the water is under pressure so that it will rise above the top of the aquifer if the aquitard is penetrated by a well. The elevation to which the water rises is known as the potentiometric surface. Where an aquifer is not bounded on top by an aquitard, the aquifer is said to be unconfined. In an unconfined aquifer, the pressure on the top surface of the groundwater is equal to that of the atmosphere. This surface is known as the water table, so unconfined aquifers are often referred to as water table aquifers. The arrangement of aquifers and aquitards in the subsurface is referred to as hydrostratigraphy.

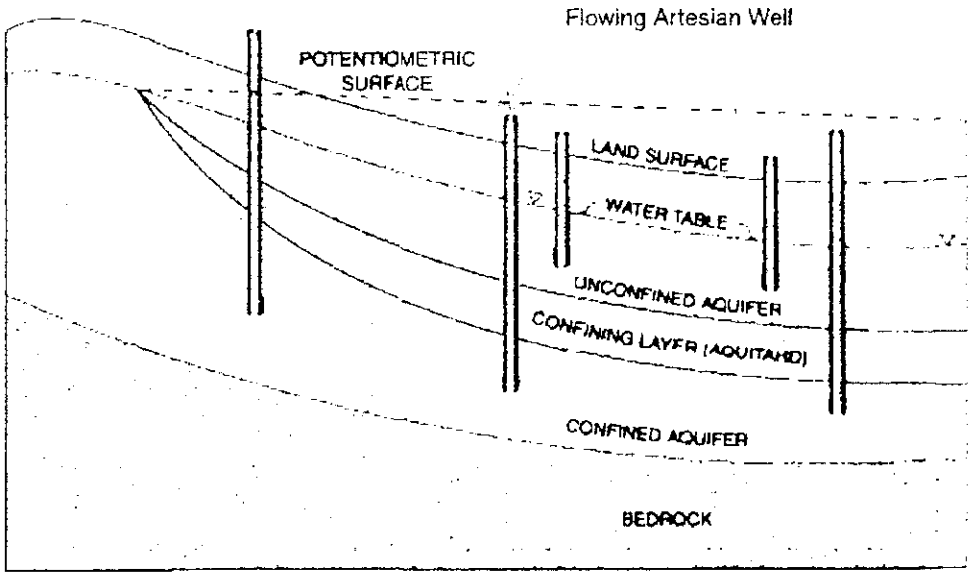


Figure 14 Interbedded aquifers with confined and unconfined conditions

(From DWR-BULLETIN 118, California's Groundwater, UPDATE 2003, p. 87).

HEIGHTS MUTUAL WATER COMPANY (SANTA ROSA)
WELL 04 - STANDBY
State Well Number: 4900612-005
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=4900612-005

MARK WEST ACRES (SANTA ROSA)
WELL 01
State Well Number: 08N/08W-26F03 M
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=08N/08W-26F03_M

MARK WEST MEADOWS MUTUAL WATER (SANTA ROSA)
WELL 01
State Well Number: 08N/08W-22R01 M
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=08N/08W-22R01_M

MICHELE MUTUAL WATER COMPANY (SANTA ROSA)
WELL 01
State Well Number: 08N/08W-26D01 M
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=08N/08W-26D01_M

RIEBLI MUTUAL WATER COMPANY (SANTA ROSA)
WELL 03
State Well Number: 4900603-003
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=4900603-003

WILSHIRE HEIGHTS (SANTA ROSA)
WELL 02
State Well Number: 08N/08W-26B02 M
http://www.geotracker.swrcb.ca.gov/reports/well_pws.asp?global_id=W0609700552&assigned_name=08N/08W-26B02_M

707

"DEIS SCOPING COMMENTS

Graton Rancheria Casino Project"

To:
Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
441 L Street, N.W, 9th Floor
Washington, D. C. 20005

From: Alfred W Soares
Alfred W. Soares
4319 Primrose Avenue
Santa Rosa, CA 95407

Comments shall relate to specific items listed on NEPA Compliance Checklist (FWS Form 3-2185).

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GAMING COMMISSION
2004 MAR 30 PM 4: 27

As a Sonoma County resident living in the unincorporated area ½ mile north of the proposed Las Vegas style Indian gaming casino and hotel-retail center location just outside the city limits of Rohnert Park.

Aside from the environmental impacts (i.e. wetlands, endangered species, growth inducing impacts) region of Sonoma County where ground water supplies are already being critically over drafted.

Clearly a sufficient and sustainable water supply to serve a proposed development project does not exist, without adversely affecting the drinking water aquifers, prime farmlands, wetlands, flood plains and ecologically sensitive areas.

The nearest water contractor (City of Rohnert Park) who buys water from the Sonoma County Water Agency (SCWA) has serious overdraft issues from their existing wells i.e. Resolution No. 2004-34 whereas on Sept. 2, 2002 Case No. 224976 a judgment implements requirements imposed on specific plan areas commonly referred to as "Water Policy Resolution" This settlement agreement also prohibits the City of Rohnert Park from exceeding 2.3 million gallons daily pumping rate (Half the cities pumping rate between 1984-1999). Notably even this amount of ground water production is at odds with the City's own General Plan concept of "Safe Yield" which clearly recognizes that the ground water sub basin is only replenished at the average rate of 1.6 m.g.d.

This project proposes 2-1000 ft wells to supply their resort casino.

- How will these effect ground water supplies of the neighboring residence and agriculture further lowering the water table?
- How will this paved over property effect the water recharge of the Santa Rosa. Plain Ground water Basin?
- How will increased impervious surface area effect neighborhoods flooding, contamination of wells?
- How will this loss of open space (Community separator) proposed in existing Sonoma County General Plan be prevented?
- How will the loss of endangered species habitat be prevented "The largest freshwater wetland complex in the Coastal Northern California." (www.lagunafoundation.org)?

ALTERNATIVE SITE:

It is my feeling that this proposed development would be better suited to a property known as Skagg's Island.

Skagg's Island is located within the Graton Rancheria Tribe's aboriginal territory in Sonoma County. The island consists of approximately 3,300 acres, with 60 acres already developed as a Naval base. The base has long been abandoned, and the U. S. Navy has expressed a desire to turn this property over to the U. S. Fish and Wildlife Service. This property is located off of Highway 37, a direct route to major metropolitan areas close by which would provide easy accessibility for the tribe's casino patrons. With the existence of the Naval base, the necessary infrastructure to support the tribe's development is already in place. There would be no need for major road improvements, no loss of residential dwellings, no construction in a flood plain, no loss of wildlife habitat, no compromising of public safety, water/air quality, no loss of open space, etc. This property at Skagg's Island is large enough to provide the tribe with several hundred acres of land for their use, as well as saving the remainder of land for environmental preservation, if desired. Skagg's Island is indeed an economically viable location for this development.

MARVIN PEDERSON
ATTORNEY AT LAW
815 FIFTH STREET
SANTA ROSA, CALIFORNIA 95404
(707) 544-9444
FAX (707) 544-5829

March 10, 2004

National Indian Gaming Commission
Hand Delivered to:
Luther Burbank Center for the Arts
Ruth Finley Person Theater
50 Mark West Springs Road
Santa Rosa, CA

RE: DEIS Scoping Comments
Graton Rancheria Casino Project

Dear Board of Supervisors:

The Stop the Casino 101 Coalition has requested me to write to you in order to provide input into your determinations in preparation of an environmental impact statement. The Coalition recent discovered information about hazardous materials deposits from a former military base at or adjacent to the casino site proposed by Stations Casino and the Federated Indians of Graton Rancheria. Enclosed please find copies of 1.) the February 1, 2004 letter of Marilee Montgomery to the U.S. Army Corps of Engineers requesting information under the Freedom of Information Act, 2.) the information from the Department of the Army responsive to Ms. Montgomery's request, 3.) the summary of the history of the proposed site prepared by Ms. Montgomery, 4.) the report of geologist Marc W. Seeley, RG, REA-II, and 5.) the April 17, 2002 memorandum from the United States Department of the Interior, Bureau of Indian Affairs that sets out policy for hazardous waste compliance for lands proposed to be placed in trust.

Our research indicates that the site on which the casino is proposed to be constructed is at or near the center of the area reported by the Department of the Army to be quite probably contaminated. As you can see from these enclosures, there is strong evidence that the proposed site of the casino is adjacent to and perhaps a part of a base for military operations that existed from approximately 1943 to 1956. Thereafter Military activities included oil and gasoline storage, small arms magazine, machine gun range, underground storage of fuels, and a very active runway with aircraft maintenance. The Army has

designated the site for further exploration and hazardous materials clean-up, but we have found no indication that any further exploration or clean-up has ever been attempted.

We believe that the location that the Stations Casino proposes is near the west end of the runway and immediately adjacent to the probable location of the machine gun range. The location of the machine gun range has not been verified, nor has it been explored with regard to lead contamination; however our preliminary air photo review suggests that there was a berm off the western end of the runway that was the site of the range. Lead deposits are generally believed to be a by-product of machine gun ranges in that the tracers fired with the rounds contain lead.

We have not found an explanation as to why no corrective work appears to have been commenced, despite the recommendations to the Army Corps of Engineers that the site should be further evaluated for unexploded ordnance, the soil tested for contamination from underground tanks and the gasoline distribution system, any contaminated soil be removed, and the matter referred for testing and evaluation,. Our investigation is continuing, and we will provide any supplemental information that may assist you in making your determination concerning the Stations Casino application.

If what appears to us to be the case turns out to be correct, as is set out in Mr. Seeley's report, the site could be highly toxic and its disturbance can potentially have significant health and safety ramifications for all concerned, including but not limited to construction workers who disturb any unexploded ordnance and lead impacted soil, neighbors affected by spread of ground water contamination, and guests and workers of any business that operates above the site. Factors that would aggravate the spread of toxics would include site grading and alteration of the drainage around the site.

Also of concern is the fact that three residential complexes have already been built on the abandoned base at the location of the potential problems identified in the Army's enclosed materials. We believe that it would be a breach of the County of Sonoma's regulatory duties to consider any further construction or soil disturbance of any type until the testing and corrective measures recommended to the Army Corps of Engineers is completed and the area is determined to be safe for development. Please note from the enclosure from the Bureau of Indian Affairs that the Bureau ". . . must conduct a contaminant survey on the lands to be acquired to ensure that no hazardous materials exist." The questions posed in Ms. Montgomery's enclosed February 1, 2004 letter are suggestions for areas of inquiry. Your requirement of a full survey and clean-up would therefore be in keeping with Federal standards for the application.

We request that as part of your recommendations on the environmental impact of taking the lands into trust you require that the U.S. Army Corps of Engineers and County and State agencies conduct the necessary research to identify the locations of the suspected hazardous materials on the lands, and that the analysis include both soil and ground water potential contaminants, deep and shallow, including but not limited to chlorinated solvents, petroleum hydrocarbons, metals, and unexploded ordnance. The analysis should also determine the impact to down gradient off-site properties. We further request that your recommendation direct that all necessary remediation be accomplished before the land be considered for inclusion into trust.

Please do not take this letter to be a conditional endorsement of the proposed casino. The Stop the Casino 101 Coalition remains unequivocally opposed to its approval for the reasons that have already been presented. This letter is to give you notice of our toxic and hazardous materials-related environmental concerns and to request abatement of the approval process until those concerns have been fully and properly addressed and corrected.

Yours very truly,

MARVIN PEDERSON

MP/lc
enc.

OUTER LANDING FIELD - COTATI
Prepared by Marilee Montgomery
February 22, 2004

HISTORY: In 1943-44, the U.S. Navy bought land in what was then known as Cotati, as a satellite airfield for the Alameda NAS. The Site Survey Summary Sheet for DERP-FUDS Site No. J09CA7470, dated September, 1999, indicates that there were two parcels of land for this site: a 218.25 acre parcel located in what is now Rohnert Park, and which has been developed over the years for commercial and residential purposes, and a 74.85 acre parcel, the exact location of which is currently unknown. This 74.85 acres is mentioned several times in various USACE reports, memoranda, and reference lists.

According to a 1944 General Layout Map of the Cotati Air Facility, the site contained two runways, a control tower, fire and crash truck building, gasoline and oil storage, a small arms magazine and a machine gun range. Other sources of historical reference indicate there were also barracks on the property, and there was at least one underground (UG) storage tank. The 1944 U.S. Army/Navy Directory of Airfields described the landing field of the "Cotati OLF, Navy" as having two runways, with the largest being 4,000 feet long.

The types of planes and/or the operations conducted at this airfield during W.W.II are unknown, however, OLF Cotati had a Tower, something which was only built on busy airfields. One aviation historian has suggested that in all probability, there were hundreds of planes using this field every day. This is a reasonable estimate, since the building of OLF Cotati coincides with the build-up in the Pacific Theater.

As late as 1948, the Cotati OLF was still depicted on Sacramento Sectional Charts as an active Navy Field. In 1949, the same chart listed it as "Cotati (Navy)", although a memorandum from the commander of Naval Air Bases, 11th and 12th Naval District, stated the status of the Cotati OLF as "inactive", with some land being leased for agricultural purposes, and the old machine gun range being used by Sonoma County Peace Officer's Association under a permit from the federal government.

The field was declared excess in 1956. From 1957-58, Standard Oil's California Research Corporation licensed the facility from the government for fuel testing purposes. Another lease permitted the City of Santa Rosa to use the airfield for drag racing. Local oral tradition has drag racing occurring there as early as 1952.

In the 1950's, there was some use of the airstrip for civilian planes. The property was conveyed by the federal government to a private party in 1958.

THE FUDS PROGRAM: In 1983, the government, under the auspices of the U.S. Army, began a process of identifying what are known as Formerly Used Defense Sites (FUDS), for the purpose of evaluating possible toxic waste contamination of these sites and determining their eligibility for cleanup using the Department of Defense guidelines established for closing military installations.

To date, more than 9,000 potential FUDS have been identified. More than 90% have been evaluated for FUDS program eligibility. Only 30% of the eligible sites require further response action. The remaining 70% do not require further action. Of the 30% that require more action, over 4,000 sites have been identified. FUDS properties include sites with contaminants ranging from industrial waste such as fuels and cleaning solvents in

groundwater, those with ordnance and explosives, and those requiring building demolition and debris removal, including asbestos remediation.

These hazards are given the following classifications:

1. *Building Demolition and Debris Removal Projects:* Requires that conditions were inherently hazardous when the property was disposed of or transferred and these conditions must present a clear danger.

2. *Hazardous, Toxic and Radioactive Waste Projects:* Includes environmental response actions related to hazardous substances, pollutants and contaminants which conform to the requirements of the National Contingency Plan of CERCLA.

3. *Containerized Hazardous, Toxic and Radioactive Waste Projects:* Differs from hazardous, toxic and radioactive waste projects in that they are classified as short-term corrective actions as opposed to long-term corrective actions. Includes but is not limited to the following: underground storage tanks, aboveground storage tanks, transformers, hydraulic systems, investigative derived wastes, abandoning of inactive monitoring wells, etc.

4. *Ordinance and Explosive Waste Projects:* Includes environmental response actions for all forms of military munitions and chemical warfare material.

5. *Potentially Responsible Party, Including Third-Party Sites:* Includes projects where the Department of Defense may share potential CERCLA responsibility for the hazardous condition.

CURRENT STATUS OF SITE: According to the U.S. Army Corps of Engineers (USACE), Sacramento Division, the Outer Landing Field (OLF) Cotati was identified as a FUDS as early as 1996, and perhaps earlier. In 1999, the base was determined to be eligible for the FUDS mitigation program and was given the property number of J09CA7470. It's status is "active".

A Site Survey was conducted on June 11, 1999, by Betty Henkle and Steve Cowen of TechLaw, the company hired by the DoD to assess the property. They met with Hugh Codding, of Codding Enterprises, at the 218.25 acre site. When asked by the team, Mr. Codding denied any knowledge of a UG tank or tanks, or any ordinance being found. The team recommended, among other things, that ground radar be used to locate the tank(s), which the Army indicates is visible in an early aerial photograph, and that the surrounding soil be tested.

Three to four projects as defined by the Department of Defense ("DoD") have been identified on this site. Information obtained from the Government Accounting Office ("GAO") lists the site four times, with each listing carrying its own description of the hazards at the site: CON/HTRW (listed twice), HTRW, and OEW-R, which translate respectively to, "Containerized Hazardous, Toxic and Radioactive Waste" (CON/HTRW), "Hazardous, Toxic, Radioactive Waste" (HTRW), and "Ordinance and Explosive Waste" (OEW-R). No soil and/or water testing or remediation has been done, and according to USACE, Sacramento, there are no funds available for this project.

USACE and GAO records indicate that OLF Cotati has been declared a hazardous site which may pose a health hazard for humans; that no remediation has been performed to date; that no testing of soil or water has been done to date; that no effort has been made to locate the underground (UG) airplane fuel and/or oil tank (s) known to have been on the site; that no effort has been made to locate rubbish and/or waste and/or surplus

material burial sites; that no effort has been made to clean up the heavily contaminated firing range known to be on the site, including the phosphorus from machine gun tracer rounds; that no effort has been made to locate the UG fuel distribution system know to be on the site; and that no testing for additional known military toxic contaminants has been done.

POSSIBLE CONTAMINANTS ON THE OLF COTATI SITE:

1. LEAD: Lead is a high-density, toxic material that is difficult to dispose of safely. There is no known "safe" level of lead exposure for children. Complex geochemical processes affect lead mobility in soil. Metallic lead is not inert in the environment, and can be oxidized to more soluble forms. These forms determine the mobility of the lead at shooting ranges. The rate of oxidation and the type of the resultant products are highly variable and are site specific.

Once oxidized, lead can be precipitate in the form of hydroxides, sulfates, carbonates, and phosphates. Each one of these is soluble, and the solubility is controlled in large part by the site-specific water chemistry to which they are exposed. Acidic conditions will also result in substantial mobility. Complexation/chelation and transport of particulates that contain lead are complication factors that may have the effect of increasing the physical movement of lead.

In general, lead is much more soluble under acidic pH, and rainwater is generally acidic. It is important to bear in mind that the site in question is an area of Vernal Wetlands, with much of it under rainwater and/or saturated with rainwater for three to six months of the year, depending on the amount of rainfall and the length of the rainy season.

Note: simple measurements of lead concentrations in soil and sediment do not provide an accurate assessment of lead bioavailability or mobility.

LEAD FROM MACHINE GUN RANGE: Issues surrounding lead contamination at shooting ranges are well documented and include the mobility of the lead in surface water or groundwater and in soil. Firing ranges are considered to be the major source of lead contamination in this country. Throughout the United States, lead from outdoor shooting ranges is known to leach out, contaminating soil and groundwater. Many outdoor ranges have been forced to close as a result. The contaminated soil from these ranges has to be removed at great expense and disposed of as hazardous waste.

At the time during which the Cotati OLF shooting range was in use, a period of roughly fifteen years, ammunition was produced from materials containing lead; most ammunition is still produced in this manner. Using such ammunition in target practice leads to lead contamination issues.

Shooting ranges produce lead contamination of the soil in two ways: airborne and spent rounds. Spent rounds are mostly found in the earthen berms of a shooting range. The bullets behave in several ways when they strike the berm, including penetrating, agglomerating, smearing, and ricocheting. While most of the lead in these berms is intact bullets and large fragments, the very small particles of lead and lead compounds that are produced from the weathering of the particles is the source of most lead mobility.

The other source contamination is airborne lead, which, when released, falls to the earth. Airborne lead is produced in three ways: (1) conventional primers use a lead based material which, when ignited, releases lead into the air at the firing line. (2) when conventional leaded ammunition is fired, lead is vaporized from the end of the projectile, releasing more lead into the air. (3) when the projectile hits the berm, lead is released into the air. All of this airborne lead then falls to the ground, thus the contamination is not only at the berm, but also at the firing line and points in between. These airborne particles are quite minute, and as such, are more soluble than the larger particles of lead from bullet fragments.

It is unknown how many pounds of lead were deposited during the period the base was occupied by the military, or later, by the Sonoma County Peace Officers Association, however, some rough estimates may be made using some known facts. In a study done by David H. Edwards of Virginia Polytechnic Institute, the gross lead amount at the U.S. Forest Service Shooting Range in the Shenandoah National Forest was at least 90,000 pounds per year from the one to three million rounds fired per year. It is reasonable to expect that the use of the Cotati OLF shooting range by the Sonoma County Peace Officers Association produced a comparable amount of lead from spent rounds.

With regard to the machine gun range during W.W. II, a W.W.II-era machine gun was capable of firing from 500 to over 1,200 rounds per minute, depending on what type of weapon was being used. ***Every third round was a tracer round containing phosphorus***. The volume of rounds fired could have resulted in excess of 1,000,000 pounds of lead per year from the machine gun range during the war era. Even limited use of a machine gun range can produce a high amount of lead deposit. For example, using the U.S. Forest Service model above, 3 million rounds = 90,000 pounds of lead, the following estimates can be determined:

1) 500 rpm x 4 hours per day =
   120,000 rounds per day x 200 days per year =
   24,000,000 rounds per year = 720,000 pounds of lead per year

2) 1200 rpm x 4 hours per day =
   288,000 rounds per day x 200 days per year =
   57,600,000 rounds per year = 1,728,000 pounds of lead per year

These estimates are extremely conservative. Nevertheless, even a limited use of the range by the military would have resulted in millions of pounds of lead over the two years that the base was active. Taken into consideration with the fact that the range was used by the Sonoma County Peace Officers Association for approximately ten years after the war ended, clearly, there is an urgent situation with regard to lead contamination at this site.

Note: According to Sgt. Gerald E. Vincent of the U.S. Army Corps of Engineers, Sacramento Division, records indicate that the machine gun range was located where the Rancho Verde Mobile Park is situated today. It is unknown what was done with the soil from the earthen berm and the earth of the shooting range in general.

LEAD FROM AIRPLANE AND/OR AUTOMOBILE FUEL: Tetraethyl lead additives to gasoline are highly toxic. This compound generally degrades in soil within a matter of months, so any organic lead currently in the soil is most likely in the form of mineralized ethyl lead breakdown products of tetraethyl lead. The toxicity of

these compounds is not known. Exposure to organic lead in surface soil presents a known public health hazard. High levels of organic lead have been identified at military airbases.

Apparently, aviation fuel and gasoline and/or diesel fuel was stored both above-ground and underground at this site. The condition or disposition of the storage tanks is unknown. It is unknown how many planes used the field each day, and how much airplane fuel and oil was stored at the facility. It is unknown how much leaded airplane fuel may have contaminated the grounds from plane crashes, fire drills, and fuel spills and/or dumping, nor is it known where such disposal, fire drills or accidental spillage may have taken place on the site.

It is unknown how the facility was used by the California Research Corporation, specifically, if automobiles crashed on the site, if fuel spills were released, or if fuel was disposed of at the site or if fuel was stored on site either underground or on the surface, nor is it known where such disposal, storage, or accidental spillage may have taken place on the site. California Research Corporation at that time engaged in, among other things, petroleum processing research; the company is now owned by Chevron. If gasoline with experimental additives were tested at the Cotati OLF site, it is not known what substances these fuels might have contained.

The same is true with the airfield's drag-racing era; the amount of contamination of the soil from crashes and re-fueling spills and/or disposal of fuel, oil, etc., and the location of same is unknown.

LEAD FROM LEAD-BASED PAINTS: It is unknown what contamination during the forties may have resulted from the common use of lead-based paint on military installations. It is possible that the ground itself may have been painted as camouflage, since this was done at some military airstrips during W.W.II. It is not known where any painting, disposal of paint, or accidental spillage of paint may have taken place on the site.

LEAD FROM DISCARDED BATTERIES: It is unknown what contamination may have resulted from indiscriminate and improper disposal of aircraft, automobile, and/or equipment batteries, nor is it known where any disposal of these items may have taken place on the site.

STUDIES OF LEAD CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF LEAD CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

2) CONTAMINANTS OTHER THAN LEAD:

CONTAMINANTS FROM AVIATION GASOLINE OTHER THAN LEAD: Known toxic contaminants of aviation gasoline include Toluene (Methylbenzene), which is toxic by ingestion, inhalation and skin absorption.

OTHER POSSIBLE CONTAMINANTS: Other possible contaminants might include, but are not limited to, the following: Chlorobenzene (Phenylchloride), found in Phenol, solvents, and pesticides; Lindane, an insecticide and fumigant; antifreeze, a poison; battery acid; diesel fuel, a toxin; kerosene; waste oil and spilled oil; paint solvents and thinners; arsenic, found in lead and copper shot and battery grids; selenium, found in relays, steel and copper, and as a vulcanizing agent for rubber. barium, found in vacuum tubes, copper, and spark plug alloys; cadmium, from electrodeposited and dipped coatings on metals, and in alloys and machinery enamels;

mercury, from thermometers, electrical apparatus, and mirror coating; silver, from electrical conductors, electrical contacts, and magnet windings; asbestos, widely used as insulation; fuel filters; oil filters; phosphorus from machine gun tracer rounds. It is unknown how many of these contaminents were present on the base.

BURIAL OF RUBBISH, WASTES, AND/OR SURPLUS MATERIAL AT THE SITE: It is unknown where the base's dump site was, although an aerial photograph of the site seems to indicate numerous "ground scars" marking the location of rather large burial pits, some of them connected by pathways. These ground scars are located just on the other side of the drainage ditch that borders the Rancho Verde Mobile Home Park on the West. A common-sense evaluation of the situation would suggest that this was the most probable location of any dump site(s) for the base, as it is unlikely that such disposal efforts would have taken place at the Eastern end of the base where the tower, access roads and out-buildings were located. It is possible that the 74.85 acres mentioned in military records may have included the property west of the mobile home park, and further study of that area is indicated.

It was also common practice during W.W. II for the military to dig "dry wells", eight to ten inches in diameter, in which they would dump all their solvents, oil, paint, paint thinners, etc. These would have been capped over with soil when they were full, or when the base was closed. The location of these dry wells, if any, are unknown.

At the end of W.W. II, chemical and other weapons and toxic material were routinely buried wherever the military had men, bases, camps, etc. Records of such burials were either poorly kept or not kept at all. The old Santa Rosa AAF base, now the site of the Sonoma County Airport, is heavily contaminated as a result of such activities; Lewiston and other toxic agents have been found buried at the site, and there is no record of these burials. We must ask ourselves if USACE taken all possible measures to ensure there were no surplus, potentially toxic material buried on or near the OLF Cotati site at the end of W.W. II.
It is unknown what contaminents might have been buried as part of the normal disposal protocol of that era, and it unknown where such burials may have taken place.

STUDIES OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No studies are known to have been conducted at this site.

MITIGATION OF OTHER SOURCES OF CONTAMINATION AT THE COTATI OLF: No mitigation is known to have occurred at this site.

TOXICS TRAVEL: It is now a known fact that toxic waste contamination "travels" to the surrounding land and water sources. Without adequate disposal methods, the heavy metals, petroleum products, and distillates, etc., produced by this military installation were most likely emitted directly into the air, soil and water of the surrounding area. Current knowledge of the movement of toxic contaminants indicate that an area of up to 500 yards surrounding this FUDS may be contaminated, and extensive testing needs to be conducted at least within a five hundred yard radius to determine the extent of the contamination.

There is great potential for water contamination, complicated by the fact that the direction in which water moves is determined by underground structures, not the slope of the land. This would necessitate extensive off-site and

on site water tests. This is especially crucial as surrounding homes use wells as their only source of water. The Army should test all wells in the area, whether those wells are privately or publicly owned.

The UG tank or tanks need to located, and their condition needs to be determined. Given that the material used for the tank(s) was probably steel, we can reasonably assume that the tanks have deteriorated, and may have sent plumes of contaminants throughout the site and the surrounding land.

The land on which Rancho Verde Mobile Home Park sits is the site of the machine gun range, later used as a firing range by the Sonoma County Peace Officer's Association. This location must be considered heavily contaminated with lead and phosphorus. USACE must be required to conduct extensive soil and water tests on the site itself and the surrounding property at least up to 500 yards of the site.

The exact location of burial pits and/or dry wells used by this facility for disposal of waste material must be identified, and once found, those sites must be tested.

IMPACT OF TOXIC WASTE CONTAMINATION ON PROPOSED AND EXISTING DEVELOPMENT: According to The Army Times, tracking down the sources of toxic contamination and determining past waste-management practices (in the military) requires "...the patience of a historian, the skill of a detective, and the tenacity of a treasure hunter....". In the absence of any real, hard data from the DoD regarding the level of pollution at this site, it must be assumed at this point that the 218.25 acres of the airstrip itself and the unidentified 74.85 acres, as well as the surrounding land up to 500 yards are heavily contaminated from its use as a military installation, and the additional contamination from the use of the firing range by the Sonoma County Peace Officers Association.

There is a long time-lag between the dumping of a toxin and groundwater contamination, identification of a specific health issue, and an eventual study of the causal links to a toxic site. The effect of exposure to low levels of chemicals leaking into the air, soil and water from toxic waste sites has not been adequately studied.

The site in question was not extensively developed until the 1980's, long after this country had increased its awareness of pollution from toxic waste contaminants. Assuming that the City of Rohnert Park possessed the common knowledge of the time, it should never have allowed development on this site. Certainly, no further development should have been permitted once the Army identified the site as hazardous in 1999. But further development has taken place since 1999, and in fact, it is taking place now. The former Crusher Stadium, only yards outside the base perimeter, is currently being developed, and this development threatens the health of the public, as dust and particulates from the excavation and grading process may contain contaminants. The lack of oversight by the City of Rohnert Park in this matter would seem to represent a wanton disregard for public safety.

Three multi-unit residential properties, consisting of two mobile home parks and one large apartment complex, are located on the 218.25 acre site itself, and there are single-family homes within 500 yards of the site. Rancho Verde Mobile Home Park is certainly the most obvious risk, however, the residents of all the homes on or adjacent to the base are in jeopardy.

The site is adjacent to a state designated groundwater recharge zone. It is a flood plain. Even the health of the Russian River and the Laguna de Santa Rosa could be at risk from the heavy metals and other known and unknown contaminants that may have resulted from this base.

A recent GAO report to Congress regarding the DoD's FUDS program was highly critical of the fact that the Army has consistently underestimated both the levels of contamination and the cost and time necessary for the remediation at these FUDS. Therefore, it can be assumed that the OLF Cotati site may well be more contaminated than the Army has indicated to date. The Army's tendency to underestimate the dangers at these sites and the cost to clean them up may be the reason that there is no plan to clean up the firing range, that no extensive soil and water testing has been conducted, and that to date, the study of the site has been cursory at best.

In addition, the hazard rating for this site was not computed correctly:

1) On Page 2 of the RAC Worksheet contained in the Final Inventory Project Report, it is logical to assume that at least some flares were kept at this facility, yet the rating for this item is shown as "0", instead of "4"

2) On Page 5 of the Worksheet, the number of buildings within a two mile radius is shown as "16 to 25", with a Value of "3". In 1999, when this report was done, there were - and still are - thousands of residential and commercial buildings within a two mile radius, as that radius includes virtually the entire town of Rohnert Park, as well as Rural Residential areas to the South, West and North of the site. On the site itself there are two mobile home parks, a large apartment complex and commercial structures, all of which existed in 1999. This Hazard Value should be rated a "5".

3) On Page 7 of the Worksheet,, under "Site Dynamics", again, the rating is inaccurately assessed; by 1999, not only had the site already had been developed further, more development on and/or adjacent to the site was anticipated. In fact at least one residential apartment project is in the works for that site. The rating should be a "5", not "0".

These ratings changes result in an overall Hazard Probability of "31", not "20", as computed by TechLaw, thereby increasing the Hazard Probability from a level 4 to level 2, at the least.

Not taken into account in this Hazard Probability rating is the lead from the firing range. This highly-toxic contaminant, which is known to pose a hazard to human health, makes the potential for toxic contamination on and around this site **EXTREME.**

SUMMARY: Although the Army may have underestimated the contamination at this site, this community should not make the same mistake. This entire area and the surrounding property up to at least 500 yards should be considered contaminated. It is of extreme importance that measures should be taken to restrict the public's access to the properties involved and to prevent any development or sale or transfer of the suspect lands until further, extensive testing is done by the DoD, and any toxic waste contamination has been thoroughly mitigated.

12-12

DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, CORPS OF ENGINEERS
333 Market Street, Room 923
San Francisco, California 94105-2195

REPLY TO
ATTENTION OF:

27 SEP 1999

CESPD-PM-R

MEMORANDUM FOR

Commander, U.S. Army Corps of Engineers, 20 Massachusetts Avenue, N. W., Washington, DC 20314-1000

Commander, U.S. Army Engineering Center, Huntsville, P.O. Box1600, Huntsville, Alabama 35807-4301

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

1. References:

a. Memorandum CEMP-RF, 17 Jan 1997, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Delegation of Preliminary Assessment of Eligibility /Inventory Project Report (PAE/INPR), Project Approvals to Division Commanders.

b. DERP-FUDS Program Manual, U. S. Army Corps of Engineers, Directorate of Military Programs, Division of Environmental Restoration, Washington, D.C., July 96.

c. CEMP-RF memorandum, 16 Oct 96, Subject: Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) - Preliminary Assessment Funding.

2. The enclosed INPR for Outer Landing Field, Cotati is approved by SPD in accordance with Ref 1a, 1b, and 1c. The INPR is being forwarded to you for your information and appropriate action. The site has been determined to be eligible for DERP-FUDS.

CESPD-PE

SUBJECT: Defense Environmental Restoration Program For Formerly Used Defense Sites (DERP-FUDS), Inventory Project Report (INPR) for Outer Landing Field, Cotati, California, Site No. J09CA747000.

3. This memorandum authorizes the OE (J09CA747001) and the CON/HTRW (J09CA747002) projects as recommended by the INPR, and assigns the CON/HTRW project to CESPK for their appropriate action. The OE project is referred to Huntsville Army Engineering and Support Center to determine the need for further action.

Encl

Thomas D. Hodgins, COL
PETER T. MADSEN
for COL(P),EN
Commanding

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO, CALIFORNIA 95814-2922

REPLY TO
ATTENTION OF
CESPK-PM-H (200-1c)

10 September 1999

MEMORANDUM FOR Commander, South Pacific Division,
ATTN: CESPD-PM-R (Vincent Del Greco)

SUBJECT: Inventory Project Report for the Former Defense Property at Outer Landing Field, Cotati, California Property No. J09CA7470.

1. The enclosed Inventory Project Report (INPR) addresses our current evaluation of the subject property. This report was prepared as a result of research conducted for other sites which indicated that additional investigation was required. This additional investigation found that an OE Project and a CON/HTRW Project were needed. The enclosed report supersedes any previously submitted report of the property.

2. I recommend that you approve the proposed CON/HTRW and OE Projects and provide a copy of the report to the Huntsville Design Center for their records.

FOR THE COMMANDER:

Encl

for MARK C. CHARLTON
Chief, Programs and Project
Management Division

FINAL
Inventory Project Report
Outer Landing Field, Cotati
Sonoma County, California
DERP/FUDS Site No. J09CA7470

Contract No. DACW05-95-D-0004
Task Order No. 0020

September 1999

Prepared For:

Department of the Army
Corps of Engineers
Sacramento District
1325 J Street
Sacramento, California 95814

Prepared By:

TechLaw, Inc.
300 Union Boulevard
Suite 600
Lakewood, Colorado 80228

SITE SURVEY SUMMARY SHEET
FOR
DERP-FUDS SITE NO. J09CA7470
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

SITE NAME: This site currently consists of a theater, apartments, retail stores, office buildings, a bank, restaurants and a trailer park. The site was previously known as the Naval Auxiliary Air Facility, NAAS Santa Rosa, Outer Landing Field, Cotati, and Air Facility, Cotati, California.

LOCATION: Outer Landing Field, Cotati (OLF Cotati) is located approximately five miles south of Santa Rosa, ten miles north of Petaluma and forty miles north of San Francisco at a latitude of 38°21' Longitude of 122° 43' (SB0217). This 216.95 acre parcel had an access road running north and south which parallels US Highway 101. According to the Sonoma County Assessor's Map the former OLF Cotati consists of Parcels 04 and 39 (CA0155 and CA0156).

SITE HISTORY: A memorandum dated November 21, 1944 states that Cotati NAAS for 218.25 acres was acquired in fees by condemnation. On June 16, 1943, a Declaration of Taking was filed between the United States of America and The Cotati Company, a corporation, Fred W. Rohnert and Edna V. Rohnert for 74.85 acres more or less. TechLaw was able to obtain the Final Judgment of Condemnation for 74.85 of the acres dated October 20, 1943 (CA0253 and SB0109); however, was unable to obtain a Declaration of Taking for the remainder.

According to a General Layout Map of the Cotati Air Facility under the Naval Air Center, Alameda, California dated September 29, 1944, the field contained an Operational and Control Tower, fire and crash truck garage, 2-25 gallon gasoline storage, an oil storage building, a well and tanks, pump house, a small arms magazine and a machine gun range (CE0349). Confirmation of this information is contained in the Appraisal of Real Estate dated May 26, 1958, which states that the above listed items were located on the facility; however, it also shows that the facility had an underground storage tank evidenced by photographs taken during the appraisal (SB0372). A Memorandum dated February 4, 1949 from the Commander, Naval Air Bases, Eleventh and Twelfth Naval District states that Cotati was designated as an outlying field of Naval Air Station, Alameda, California, and was in inactive status. The facility consisted of runways, a tower, and a couple of small shacks. The arable lands were under a lease for agricultural purposes and the Sonoma County Peace Officers' Association used the rifle range under a permit (SB0100). TechLaw was unable to obtain any of the permits or leases regarding the rifle range.

Lease NOy (R)60649 for 95 acres was granted to M. J. Azevedo for the purpose of growing hay. The term of Lease was extended for a period of one year commencing September 1, 1956 and ending August 31, 1957 (SB0400, SB0401, SB0408, SB0410 and SB0412).

A Naval Speed letter dated February 16, 1956 states that the former OLF Cotati was reported excess and provides no actual disposal date (SB0420). However, a letter from the Twelfth Naval District state that the property has been declared excess and is being referred to the Bureau of Yards and Docks for

screening action by all Federal Agencies. At the conclusion, it will be transferred to General Services Administration (GSA) for disposal (SB0419). Additionally, a Naval Speed letter dated February 27, 1956, estimated a target date for reporting to GSA should be June 1, 1956 (SB0418).

In a letter dated November 15, 1957, the California Research Corporation requested a license covering the use of runways located at the former Outer Landing Field, Cotati for road testing purposes (SB0395). Lease NOy (R) 54080, which consisted of 35.3 acres was approved for a period of one year from December 1, 1957 to November 30, 1958 (SB0392).

According to Lease (NOy (R) 50272) and under Resolution No. 4997, the City of Santa Rosa used the former Navy outlying field airstrip for purpose of drag racing (SB0391, SB0407, SB0414). The Lease for the 95 acres for use of airstrips by the City of Santa Rosa was canceled January 31, 1957 (SB0402).

A letter from the Twelfth Naval District states that the property has been determined by GSA to be surplus to the needs of the Federal Government. However, GSA agreed to defer disposal action until after 1 July 1957 (SB0398).

According to an Appraisal of Real Estate dated May 26, 1958, the property consisting of 216.956 acres was conveyed by the United States Government on July 21, 1958 to Michael C. Callen by Deed recorded on September 18, 1958 (SB0387 and SB0390). Currently, the property is owned by Codding Enterprises, which is a property management company. The property consists of a theater, retail stores, bank, restaurants, a trailer park, apartment buildings, and office buildings.

SITE VISIT: A site visit was conducted on June 11, 1999 to observe current conditions of the site and to identify features of the site as they relate to DoD activities. Betty Henkle and Steve Cowen of TechLaw conducted the site visit.

TechLaw personnel arrived at the former Outer Landing Field, Cotati at approximately 11:00 a.m. The area consists of Rancho Verde Mobile Home Park to the north, theater, bank, restaurants, office buildings and retail stores to the south and an apartment complex to the east (Photograph 1, 2, and 3).

TechLaw personnel met with Mr. Hugh Codding, of Codding Enterprises, owner of the property that contained the former OLF, Cotati. He confirmed that the field was used by the Navy during WWII and stated that he used to fly his small plane into the former landing field in the 1950s while it was being utilized for drag racing and road testing. TechLaw personnel asked if he knew if there were any underground storage tanks or evidence of ordnance on the property. Mr. Codding was unaware of any underground storage tanks or any evidence of ordnance.

TechLaw was unable to obtain any information from other agencies regarding underground storage tanks prior to the submitting of the draft report. However, if any information is obtained, it will be submitted with the Final Report.

As a result of the site visit conducted at the former OLF, Cotati, the following conclusions have been developed:

- The site currently consists of a theater, apartments, retail stores, office buildings, a bank, restaurants and a trailer park.
- The site is accessible to the public.
- The 2-25 gallon gasoline storage that existed on the former OLF, Cotati were above ground tanks and TechLaw is not sure of the operations pertaining to the oil storage building and no physical evidence exists.
- Documented evidence shows that the former OLF, Cotati contained a small arms magazine storage, a machine gun range, and an underground gasoline storage tank.
- According to the Appraisal of Real Estate dated May 26, 1958, the well, gasoline distribution system, gas, water, electrical and sewage disposal systems were all assumed by reason of observation, to have been damaged or removed. However, at the time of this draft report, no information was available from any other agencies.

CATEGORY OF HAZARDS: OE, CON/HTRW

PROJECT DESCRIPTION: There are two potential projects at this site.

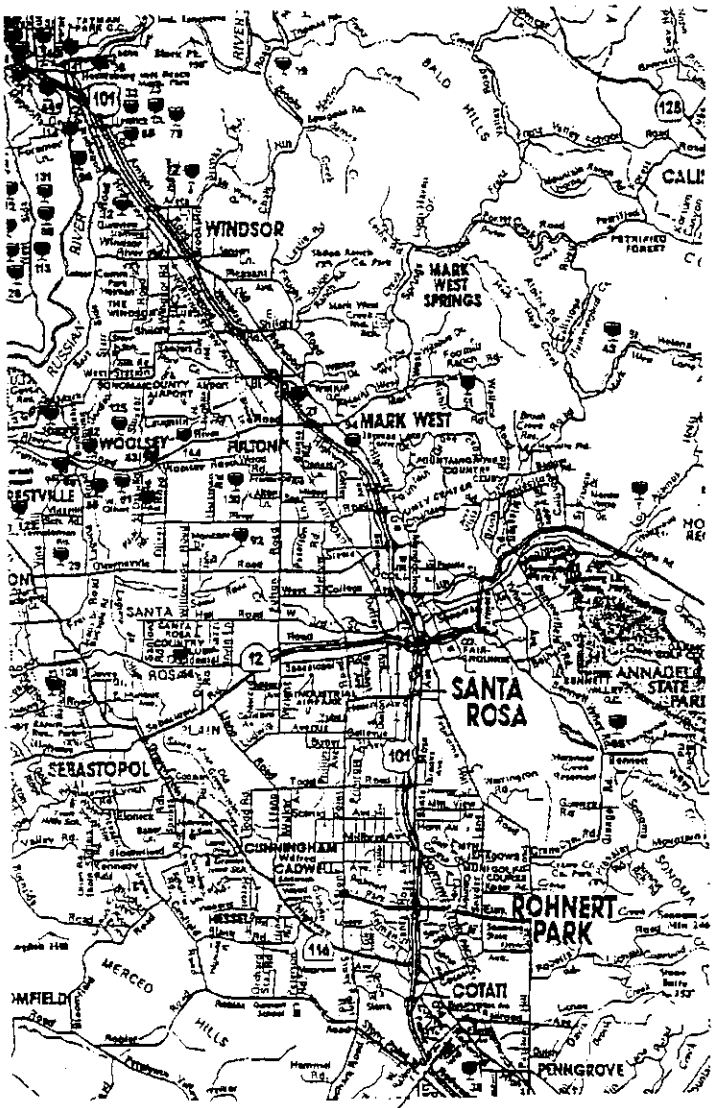
a. OE. Evidence indicates that this site was used to store ordnance. A project is recommended to locate any waste sites which may contain any unexploded ordnance.

b. CON/HTRW. Evidence exists that the site included an underground gasoline storage tank. A project is recommended to locate the underground storage tank using ground-penetrating radar and magnetic surveys. Remove and dispose of an underground storage tank and test soil beneath the tank for possible contamination.

AVAILABLE STUDIES AND REPORTS:

Historical documents obtained from the Pacific Sierra National Archives in San Bruno and the U.S. Army Corps of Engineers, Sacramento District. A list of documents referenced in the report is attached.

POC: Mr. Bill Mullery, U. S. Army Corps of Engineers, Sacramento District, (916) 557-6944.



Outer Landing Field, Cotati

Site location in California

Figure 1

LEGEND

Site location map of
Outer Landing Field, Cotati

SOURCE: Compass Maps, Inc.

TechLaw, Inc.

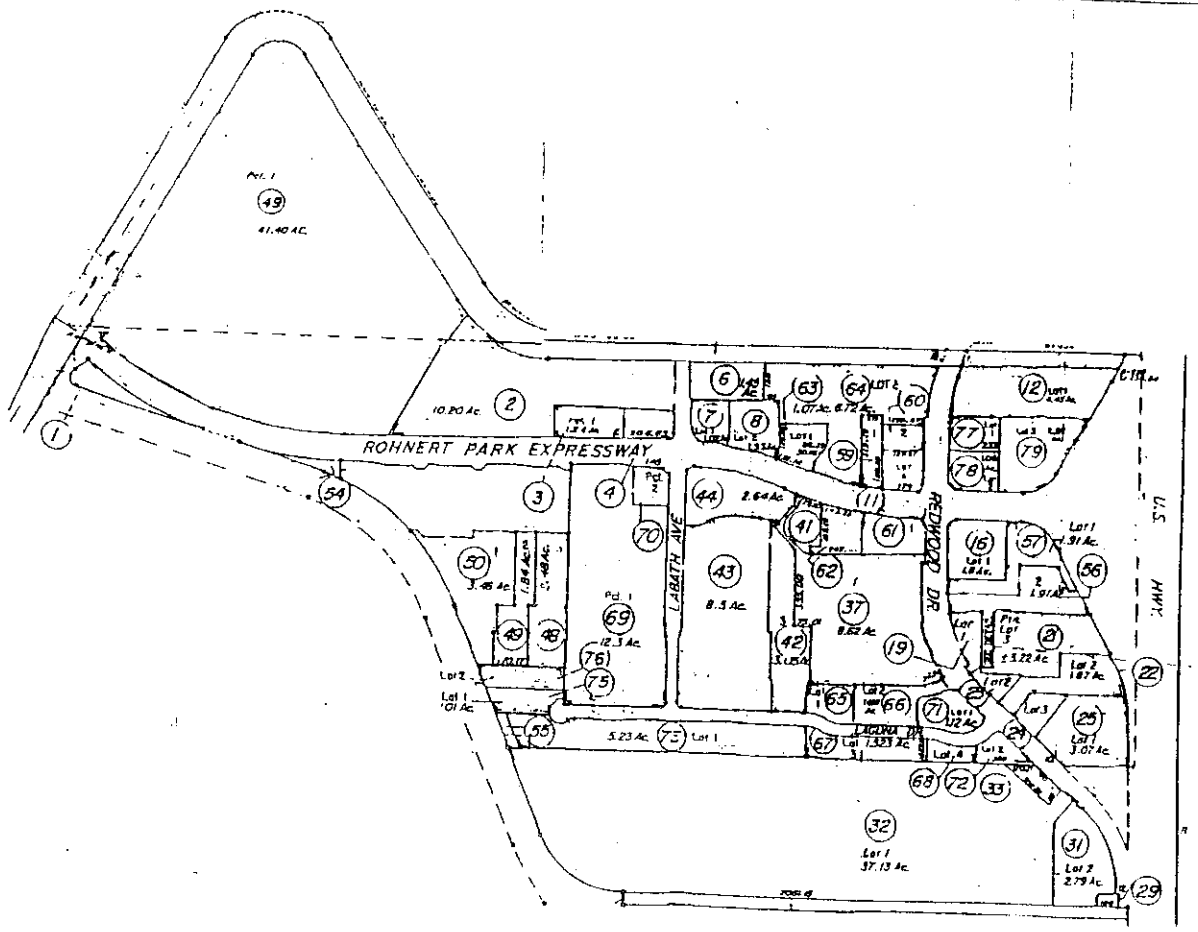


Figure 2

LEGEND

Map depicting all the properties of the Former Outer Landing Field Cotati

SOURCE: Sonoma County Assessors Office

TechLaw, Inc.

Outer Landing Field, Cotati
List of References

Begdocid	Docdate	Doctitle	Author	Authorg	Source	Reference No.
CA0155	01/01/1901	Map titled "County Assessor's Parcel Map, Book 143, Page 04, Sonoma County".	Not indicated	Not indicated	County Assessor's Office, Sonoma County	
CA0156	01/01/1901	Map titled "County Assessor's Parcel Map, Assessor's Map Book 143, Page 39, Sonoma County".	Not indicated	Not indicated	County Assessor's Office, Sonoma County	
CA0253	10/20/1943	Final Judgment of Condemnation for 74.85 acres to the United States of America and The Cotati Company	Welsh, Martin I.	U.S. District Court	County Recorder's Office, Sonoma County, CA	Book 592, page 39
CE0349	09/29/1944	Map titled "Naval Air Center Alameda, Air Facility, Cotati General Layout". Drawing No. 1273.	Nichols, Madison	Public Works Office	USACE, Sacramento Division	
SB0100	02/04/1949	Letter listing status of Air Base activities.	Springmeyer, L.P.	Naval Air Bases, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG 181, Records of Naval Districts and Shore Establishment-12th Naval District Airbases, Re Acquisition Files, Box No. 4 of 4, Accession No. NN373-91 (181-61-0096), Folder titled, "NA/Miscellaneous Air Facilities 9/45-12/58."
SB0109	11/21/1944	Memorandum containing summary of information on land acquisitions and Real Estate.	Stephans, Albert Lee	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG 181, Records of Naval Districts and Shore Establishment-12th Naval District Airbases, Re Acquisition Files, Box No. 4 of 4, Accession No. NN373-91 (181-61-0096), Folder titled, "NA/Miscellaneous Air Facilities 9/45-12/58."
SB0217	07/13/1943	Flight Control Map of NAAF Cotati, CA.	Not indicated	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	RG181, Records of Naval Districts and Shore Establishments, Public Works, 12 Naval District, Engineering Drawings of Airbase and Airstation Facilities, Accession No. NN373-91 (181-60-641)."Roll #1 (Maps)."
SB0372	05/26/1958	Appraisal of 216.95 acre parcel of land known as the Naval Outlying Field, Cotati.	Jordan, Edwin F.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 121, Box No: 6, Accession No: 9-NSS-121-87-001
SB0387	01/01/1901	Valuation Report to provide allocations of value for portions of the Naval Outlying Field at Cotati.	Robertson, Norman R.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 121, Box No: 6, Accession No: 9-NSS-121-87-001
SB0390	01/01/1901	Letter stating the inclosure of one quitclaim deed for the Naval Outlying Field at Cotati. Includes quitclaim deed.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0391	05/19/1938	Letter stating the inclosure of a license for use of the airstrip at the former Navy Outlying Field at Cotati and if acceptable have it executed on behalf of the City of Santa Rosa.	Springmeyer, L.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

Outer Landing Field, Cotati
List of References

Docnbr	Docdate	Doctitle	Author	Authorg	Source	Reference No.
SB0392	01/01/1901	Letter to a research corporation stating that the fully executed license NOy(R)-54080 covers the use and occupancy of two runways at the former Naval Outlying Field at Cotati. Includes license.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0395	11/15/1957	Letter stating a license covering the use of runways on subject facility has been prepared. Includes a letter from research corporation requesting a license to use the abandoned airstrip at Cotati.	Springmeyer, L.P. Cooley, John L.	District Public Works, Twelfth Naval District California Research Corporation	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0398	05/27/1957	Letter stating that the General Services Administration has agreed to defer disposal action on the property until after 1 July 1957.	Holcombe, W.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0400	01/14/1957	Letter concerning the extension of a lease covering use of approximately 95 acres of land at NAAS Cotati.	Wright, L.C.	Bureau of Yards and Docks	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0401	01/03/1957	Letter stating the enclosure of third amendment to lease NOy(R)-60649.	Valentine, W.J.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0402	12/28/1957	Letter stating that the Department of the Navy is in the process of transferring the Navy Outlying Field, Cotati to the General Services Administration for disposal.	Gardiner, A.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0407	10/08/1956	Letters giving reference to a condition report requested by the District Public Works Officer regarding OLF Cotati. Includes resolution No. 4997 and Condition Report.	Turner, Frank Springmeyer, L.P. Jensen, H. A. Maxwell, Richard B.	Naval Air Station, Alameda, CA District Public Works, Twelfth Naval District Mayor, City of Santa Rosa Office of the City Attorney	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0408	09/25/1956	Letters stating that terms of lease expires 31 August 1956. Includes request for an extension of terms for one year beginning 1 September 1956.	Valentine, W.J. Springmeyer, L.P.	District Public Works, Twelfth Naval District District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0410	09/05/1956	Naval Speedletter informing of approved lease extension beginning 1 September 1956 and of project to dispose of station. Includes Route Sheet No. NASA 226.	Wright, L.C.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

Outer Landing Field, Cotati
List of References

Refdoc	Docdate	Doctitle	Author	Authorg	Source	Reference No.
SB0412	08/20/1956	Letter requesting approval from the Bureau of Yards and Docks to extend lease for a one year period. Includes one indorsement.	Redman, John R. Gardiner, A.P.	Twelfth Naval District District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0414	07/18/1956	Letter requesting a permit license for the use of OLF Cotati as a "Drag Strip".	Hood, Samuel B.	City of Santa Rosa	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0418	02/27/1956	Naval Speedletter concerning the screening of subject property and the status of disposition.	Martindill, D. R.	Not indicated	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0419	02/23/1956	Letter giving information concerning requests for use of the former Naval Outlying Field at Cotati.	Gardiner, A.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)
SB0420	02/16/1956	Naval Speedletter states numerous requests for outleasing runways have been received.	Springmeyer, L.P.	District Public Works, Twelfth Naval District	National Archives and Records Administration, Pacific Sierra Region, San Bruno	Record Group: 181, Box No: 8 of 10, Accession No: NN373-91 (181-61-0096)

DEFENSE ENVIRONMENTAL RESTORATION PROGRAM
FORMERLY USED DEFENSE SITES
FINDINGS AND DETERMINATION OF ELIGIBILITY

OUTER LANDING FIELD COTATI
SONOMA COUNTY, CALIFORNIA
DERP-FUDS SITE NO. J09CA7470

FINDINGS OF FACT

1. A memorandum dated November 21, 1944 states that 218.25 acres of land was acquired in fee by condemnation to form the Outer Landing Field Cotati. On June 16, 1943, a Declaration of Taking Civil No. 4607 was filed between the United States of America and The Cotati Company, a corporation owned by Fred W. Rohnert and Edna V. Rohnert for 74.85 acres, more or less. Although the Final Judgment of Condemnation for 74.85 acres dated October 20, 1943 was obtained; the condemnation for the remainder of the 218.25 acres was not located.

2. The property was designated as an outlying field of Naval Air Station, Alameda, California. The airfield contained an Operational and Control Tower, fire and crash truck garage, 2-25 gallon gasoline storage containers, an oil storage building, a well and tanks, pump house, a small arms magazine and a machine gun range. Additionally, the Appraisal Report states there was a gasoline distribution system and a photograph is included in the report showing the top of an underground oil storage tank. It is unclear what type of operations were conducted in the oil storage building.

3. A Naval Speed letter dated February 16, 1956 states that the former OLF Cotati was reported excess, but does not provide the actual disposal date. A Naval Speed letter dated February 27, 1956, estimated a target date for reporting to GSA as June 1, 1956. According to an Appraisal of Real Estate dated May 26, 1958, the property consisting of 216.95 acres was conveyed by the United States Government on July 21, 1958 to Michael C. Callen by Deed recorded on September 18, 1958.

DETERMINATION

Based on the foregoing findings of fact, the site has been determined to be formerly used by DoD. It is therefore eligible for the Defense Environmental Restoration Program-Formerly Used Defense Sites established under 10 USC 2701 et seq.

27 Sep 99
DATE

FOR PETER T. MADSEN
COLONEL (P), U.S. ARMY
COMMANDING

PROJECT SUMMARY SHEET
FOR
DERP-FUDS OE PROJECT NO. J09CA747001
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

PROJECT DESCRIPTION: Evidence shows that DoD used the site as an airfield during World War II. The site contained a small arms magazine storage and a machine gun range. While there have been no reports of ordnance being found on this site, there is still the possibility that ordnance was buried over time. The site is heavily used by the public.

PROJECT ELIGIBILITY: The site was used by DoD as an airfield during World War II.

POLICY CONSIDERATION: There is no policy applicable to this project.

PROPOSED PROJECT: This site should be further evaluated for unexploded ordnance and should be referred to CEHND for recommendations on further action.

RAC FORM: Attached.

POC: Mr. Bill Mullery, U.S. Army Corps of Engineers, Sacramento District, (916) 557-6944.

Project Present Value Cost Summary Report

Project

Name: Outer Landing Field Cotati Sonoma County Ca.
ID: J09CA7470
Location: SANTA ROSA, CALIFORNIA
Description: Con/HTRW Evidence exist that the site included an underground gasoline storge tank. Aproject is recommended to locate the underground tank using GPR & magnetic survey. Remove and dispose of the UST and test the soil beneath the t

Site

Name: UST Removal
ID: 01
Type: Con/HTRW
Description: The site could contain at least one (1) 5000 gallon fuel storage tank. The tank will be removed and the site will be backfilled with clean fill. Soil and grou water remediation will be addressed in HTRW section of this estimate

Phase Element Type	Phase Element Name	Capital Cost	O&M Cost
Studies	PEA	85,335	
Remedial Design	RA-C	8,245	
Remedial Action	RA-C	126,851	
	Site Totals	220,430	0

Site

Name: Ordnance Storage & Machine Gun Range
ID: 02
Type: HTRW
Description: Evidence exists that the site included ordnance storage facility and a machine gu range. A project is recommended to locate any areas which may contain contar as a result of the use, storage or disposal of ordnance.

Phase Element Type	Phase Element Name	Capital Cost	O&M Cost
Studies	PEA	42,220	
Studies	RI/FS	803,898	
Studies	SI	121,820	
Remedial Action	RA-C	244,061	

Note: All costs are shown as "Present Value" costs (with markups, non-escalated)

Cost Database Date 1/1/99

Print Date: 8/19/99 2:33:12 PM

This report for official U.S. Government use only.

PROJECT SUMMARY SHEET
FOR
DERP-FUDS CON/HTRW PROJECT NO. J09CA747002
OUTER LANDING FIELD, COTATI
SONOMA COUNTY, CALIFORNIA

PROJECT DESCRIPTION: An underground storage tank exists on the former OLF, Cotati according to an Appraisal of Real Estate dated May 26, 1958. Evidence shows that DoD used the site as an airfield during World War II. The site contained an underground oil storage tank and a gasoline distribution system according to the documentation and the photographs provided with the appraisal. The site is heavily used by the public and may pose a hazard to surrounding soil and groundwater.

PROJECT ELIGIBILITY: The underground gasoline storage tank and associated gasoline distribution system was installed and used by the DoD. They are a potential source of environmental contamination. Therefore, remedial actions are eligible for DoD funding.

POLICY CONSIDERATIONS: Although a portion of the property was used by parties other than DoD, the underground storage tanks and associated gasoline distribution system recommended for removal have not been used since DoD occupancy.

PROPOSED PROJECT: Definitively locate the oil storage tank and gasoline distribution system at the former OLF Cotati. Remove and dispose of tank and distribution system. Test the underlying soil to determine the extent and severity of any soil contamination. Dispose of contaminated soil and replace with clean imported fill.

COST ESTIMATE: Attached.

POC: Mr. Bill Mullery, U.S. Army Corps of Engineers, Sacramento District, (916) 557-6944.

APPENDIX B
RISK ASSESSMENT PROCEDURES FOR ORDNANCE AND EXPLOSIVE (OE) SITES

Site Name Outer Landing Field, Cotati
Site Location Sonoma, California
DERP Project # J09CA7470
Date Completed June 23, 1999

Rater's Name Betty Henkle
Phone No. 916-557-6826
Organization TechLaw, Inc.
RAC Score 4

OE RISK ASSESSMENT:

This risk assessment procedure was developed in accordance with MIL-STD 882C and AR 385-10. The RAC score will be used by CEHNC to prioritize the remedial action at Formerly Used Defense Sites. The UXO risk assessment should be based upon best available information resulting from records searches, reports of Explosive Ordnance Disposal (EOD) detachment actions, and field observations, interviews, and measurements. This information is used to assess the risk involved based upon the potential OE hazards identified at the site. The risk assessment is composed of two factors, **hazard severity and hazard probability**. Personnel involved in visits to potential OE sites should view the CEHNC videotape entitled "A Life Threatening Encounter:OE."

Part I. Hazard Severity. Hazard severity categories are defined to provide a qualitative measure of the worst credible mishap resulting from personnel exposure to various types and quantities of unexploded ordnance items.

TYPE OF ORDNANCE
(Circle all values that apply)

A. Conventional Ordnance and Ammunition:	VALUE
Medium/Large Caliber (20 mm and larger)	10
Bombs, Explosive	10
Grenades, Hand and Rifle, Explosive	10
Landmines, Explosive	10
Rockets, Guided Missiles, Explosive	10
Detonators, Blasting Caps, Fuzes, Boosters, Bursters	6
Bombs, Practice (w/spotting charges)	6
Grenades, Practice (w/spotting charges)	4
Landmines, Practice (w/spotting charges)	4
Small Arms, complete (.22 cal - .50 cal)	1
Small Arms, Expended	0

Practice ordnance (wo/spotting charges)	0
Conventional Ordnance and Ammunition (Select the largest single value)	1

What evidence do you have regarding conventional UXO?

B. Pyrotechnics (For munitions not described above.)

	VALUE
Munition (Container) Containing White Phosphorus or other Pyrophoric Material (i.e., Spontaneously Flammable)	10
Munition Containing A Flame or incendiary Material (i.e., Napalm, Triethlaluminum Metal Incendiaries)	6
Flares,Signals, Simulators	4
Pyrotechnics (Select the largest single value)	0

What evidence do you have regarding pyrotechnics? None

C. Bulk High Explosives (Not an integral part of conventional ordnance; uncontainerized.)

	VALUE
Primary or Initiating Explosives (Lead Styphnate, Lead Azide, Nitroglycerin, Mercury Azide, Mercury Fulminate, Tetracene, etc.)	10
Demolition Charges	10
Secondary Explosives (PETN, Compositions A, B, C, Tetryl, TNT, RDX, HMX, HBX, Black Powder, etc.)	8
Military Dynamite	6
Less Sensitive Explosives (Ammonium Nitrate, Explosive D, etc.)	3
High Explosives (Select the largest single value)	0

What evidence do you have regarding bulk explosives? None

D. Bulk Propellants (Not an integral part of rockets, guided missiles, or other conventional ordnance; uncontainerized)

	VALUE
Solid or Liquid Propellants	6
Propellants	0

What evidence do you have regarding bulk propellants? None

E. Chemical Warfare Material and Radiological Weapons

	VALUE
Toxic Chemical Agents (Choking, Nerve, Blood, Blister)	25
War Gas Identification Sets	20
Radiological	15
Riot Control Agents (Vomiting, Tear)	5
Chemical and Radiological (Select the largest single value)	0

What evidence do you have of chemical/radiological OE? None

==========

TOTAL HAZARD SEVERITY VALUE 1
(Sum of Largest Values for A through E--Maximum of 61)
Apply this value to Table 1 to determine Hazard Severity Category.

TABLE 1

HAZARD SEVERITY*

Description	Category	Hazard Severity Value
CATASTROPHIC	I	21 and greater
CRITICAL	II	10 to 20
MARGINAL	III	5 to 9
NEGLIGIBLE	IV	1 to 4
**NONE		0

* Apply Hazard Severity Category to Table 3.

**If Hazard Severity Value is 0, you do not need to complete Part II. Proceed to Part III and use a RAC Score of 5 to determine your appropriate action.

Part II. Hazard Probability. The probability that a hazard has been or will be created due to the presence and other rated factors of unexploded ordnance or explosive materials on a formerly used DOD site.

AREA, EXTENT, ACCESSIBILITY OF OE HAZARD
(Circle all values that apply)

A. Locations of OE Hazards

	VALUE
On the surface	5
Within Tanks, Pipes, Vessels or Other confined locations.	4
Inside walls, ceilings, or other parts of Buildings or Structures.	3
Subsurface	2
Location (Select the single largest value)	2

What evidence do you have regarding location of OE? The area where the machine gun range and the small arms magazine was located now consists of apartment buildings, retail stores, and restaurants.

B. Distance to nearest inhabited locations or structures likely to be at risk from OE hazard (roads, parks, playgrounds, and buildings).

	VALUE
Less than 1250 feet	5
1250 feet to 0.5 miles	4
0.5 miles to 1.0 mile	3
1.0 mile to 2.0 miles	2
Over 2 miles	1
Distance (Select the single largest value)	5

What are the nearest inhabited structures/buildings? The area where the machine gun range and the small arms magazine was located now consists of apartment buildings, retail stores, and restaurants.

C. Number of buildings within a 2 mile radius measured from the OE hazard area, not the installation boundary.

	VALUE
26 and over	5
16 to 25	4
11 to 15	3
6 to 10	2
1 to 5	1
0	0
Number of Buildings (Select the single largest value)	3

Narrative The area consists of apartment buildings, office buildings, retail stores, and a trailer park.

D. Types of Buildings (within a 2 mile radius)

	VALUE
Educational, Child Care, Residential, Hospitals, Hotels, Commercial, Shopping Centers	5
Industrial, Warehouse, etc.	4
Agricultural, Forestry, etc.	3
Detention, Correctional	2
No Buildings	0

Types of Buildings (Select the largest single value) 5

Describe types of buildings in the area. The area consists of a theater, retail stores, restaurants, and a bank.

E. Accessibility to site refers to access by humans to ordnance and explosive wastes. Use the following guidance:

BARRIER	VALUE
No barrier or security system	5
Barrier is incomplete (e.g., in disrepair or does not completely surround the site). Barrier is intended to deny egress from the site, as for a barbed wire fence for grazing.	4
A barrier, (any kind of fence in good repair) but no separate means to control entry. Barrier is intended to deny access to the site.	3
Security guard, but no barrier	2
Isolated site	1
A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) which continuously monitors and controls entry onto the facility; or	0

An artificial or natural barrier (e.g., a fence combined with a cliff), which completely surrounds the facility; and a means to control entry, at all times, through the gates or other entrances to the facility (e.g., an attendant, television monitors, locked entrances, or controlled roadway access to the facility)

Accessibility (Select the single largest value) 5

Describe the site accessibility. The site is accessible by walking or by vehicle. There are no barriers preventing access.

F. Site Dynamics - This deals with site conditions that are subject to change in the future, but may be stable at the present. Examples would be excessive soil erosion by beaches or streams, increasing land development that could reduce distances from the site to inhabited areas or otherwise increase accessability.

	VALUE
Expected	5
None Anticipated	0
Site Dynamics (Select largest value)	0

Describe the site dynamics._____

TOTAL HAZARD PROBABILITY VALUE
(Sum of Largest Values for A through F--Maximum of 30) 20
Apply this value to Hazard Probability Table 2 to determine Hazard Probability Level.

TABLE 2

HAZARD PROBABILITY

Description	Level	Hazard Probability Value
FREQUENT	A	27 or greater

PROBABLE	B	21 to 26
OCCASIONAL	C	15 to 20
REMOTE	D	8 to 14
IMPROBABLE	E	less than 8

*** Apply Hazard Probability Level to Table 3.**

Part III. Risk Assessment. The risk assessment value for this site is determined using the following Table 3. Enter with the results of the hazard probability and hazard severity values.

TABLE 3

Probability Level	FREQUENT A	PROBABLE B	OCCASIONAL C	REMOTE D	IMPROBABLE E
Severity Category:					
CATASTROPHIC I	1	1	2	3	4
CRITICAL II	1	2	3	4	5
MARGINAL III	2	3	4	4	5
NEGLIGIBLE IV	3	4	4	5	5

RISK ASSESSMENT CODE (RAC)

RAC 1 Expedite INPR, recommending further action by CEHNC - Call CEHNC-OE-S (commercial 256-895-1582/1598)

RAC 2 High priority on completion of INPR - Recommend further action by CEHNC

RAC 3 Complete INPR - Recommend further action by CEHNC.

RAC 4 Complete INPR - Recommend further action by CEHNC.

RAC 5 Usually indicates that no further action (NOFA) is necessary. Submit NOFA and RAC to CEHNC.

Part IV. Narrative. Summarize the documented evidence that supports this risk assessment. If no documented evidence was available, explain all the assumptions that you made.

Research indicates that the property contained a small arms magazine and a machine gun range. These buildings are no longer at the site. The property is now fully developed, consisting of a theater, retail stores, bank, restaurants, a trailer park, apartment buildings, and office buildings. There have been no incidents regarding OE at the site.

RECEIVED MAR 5 2004

ENVIRONMENTAL
GEOLOGY
SERVICES
CONSULTING and PROJECT MANAGEMENT
1695 Willowside Road, Santa Rosa, CA 95401

March 3, 2004

Mr. Marvin Pederson
Attorney at Law
1815 5th Street, Suite 200
Santa Rosa, CA 95401

**RE: PRELIMINARY REVIEW
POTENTIAL HAZARDOUS MATERIALS IMPACTS
FORMER U. S. NAVY COTATI OUTER LANDING FIELD
AND DOWN GRADIENT AREAS
RHONERT PARK, CALIFORNIA**

To Whom It May Concern:

This review and letter has been prepared in accordance the request of Mr. Chip Worthington.

PURPOSE AND BACKGROUND

The purpose was to conduct a preliminary review of some of the readily available information regarding the site history of the former U. S. Navy Cotati Outer Landing Field (Cotati OLF). The focus of this preliminary review is on potential hazardous materials impacts at and adjacent to the Cotati OLF from past military activities, specifically with regard to the proposed casino development west of the Cotati OLF. State and local regulatory agencies should be aware of potential hazardous materials impacts to the area.

Previous military use of the site is of potential concern because of possible future development of parts of the Cotati OLF and down gradient areas. Past site use may have resulted in hazardous materials impacts that may adversely impact area residents during construction, and might have possible negative impacts to future occupants of developed projects. Additionally there is concern that potential environmental conditions could adversely impact workers during construction activities. Military activities at the Coati OLF may have potentially impacted adjacent and down gradient areas such as the proposed casino site and these potential impacts should be more clearly defined and remediated prior to development.

SCOPE OF WORK

For this preliminary review the scope of work was limited to the following:

1. Review background summary history prepared by Marilee Montgomery,

2. Review available stereo pair air photos of the site and area (June 12, 1956, AV222-03, frames 8 & 9, scale 1:24,000, and later years),

PHONE 707-528-0810 ■ FAX 707-528-1956

3. Review U. S. Army Corps of Engineers Memorandum to Vincent Del Greco from Mark C. Charlton, dated September 10, 1999

4. Review report on Cotati OLF by TechLaw, Inc. prepared for the U. S. Army Corps of Engineers, Sacramento District, dated September 1999.

SUMMARY OF FINDINGS

Based on the results of the above review it is our opinion that the Cotati OLF has the following characteristics:

- The Cotati OLF consisted of two parcels of land: a 218.25 acre parcel and a 74.85 acre parcel. The 218.25 acre parcel was apparently the main airfield, but the location of the 74.85 acre parcel has not yet been determined.

- The Cotati OLF was operated by the U. S. Navy from approximately 1944 through 1949 and the facility included two runways, a crash and fire truck building, barracks, a control tower, oil and gasoline storage, small arms magazine and a machine gun range.

- Fuel testing was conducted at the facility by Standard Oil of California from 1957 to 1958 after it was declared excess government property. Also in the 1950's and later it was used as for drag racing and sports car racing.

- In 1983 the U. S. Army began identify inactive military facilities to be evaluated for possible toxic waste and hazardous materials issues. Aproximatly 90% of these facilities known as Formerly Used Defense Sites (FUDS), have been evaluated for clean up eligibility. Issues of concern at FUDS depend on past site activities and include: fuels and solvents in ground water, buried explosives and ordnance, asbestos, dump sites and lead contamination. The Cotati OLF was identified as a FUDS by 1996 and in 1999 the former Navy base was determined eligible for the FUDS mitigation program.

- LawTech was retained by the U. S. Army Corps of Engineers to assess the property (referred to as the 216.95 acre parcel). Their report makes reference to an oil storage building, gasoline storage, a small arms magazine and a machine gun range located on the facility, and underground storage tanks. The report indicated two categories of remedial / clean up projects: OE - Evidence of ordinance storage. Recommends finding the locations of waste sites that may contain unexploded ordnance, and CON/HTRW - Evidence of underground gasoline storage tanks. Recommends locating tanks and testing soil for possible contamination. For some reason they did not discuss lead contamination impacts from the machine gun firing range.

- Analysis of stereo pair air photos of the Cotati OLF taken in 1956, some seven years after Navy operations show the runways, access roads, probable aircraft machine gun test range berm (near west end of runway), and remaining buildings / building pads. The property from the west end of the runways to Stony Point Road are pockmarked with numerous circular, crater like features, and this area contains a larger area of disturbed soil. Although the origin of these features is not known, they could be related to previous military activities such as waste disposal or ordinance disposal. These areas are down gradient from the runways and appear to be outside of the 218.25 acre parcel comprising the main Cotati OLF. This area might contain the previously referenced 74.85 acre parcel.

CONCLUSIONS

The U. S. Army Corps of Engineers records show the Cotati OLF site as a declared potential hazardous waste site which has been recommended for further exploration and possible remediation. The presence of the Cotati OLF has the potential to impact adjacent and especially down gradient property such as the area of the proposed casino development.

Although the amount of aircraft maintenance was performed at the site is not known, if chlorinated solvents were used (a common WW-II era practice in aircraft parts cleaning) both shallow and deep ground water resources could be impacted. These kinds of liquid hazardous wastes were typically disposed of in on site "dry wells".

To date no known effort has been made to locate the underground storage tanks (USTs) and determine their impacts to the local ground water. Underground fuel tanks from this era have a high potential to have leaked and caused contamination to the shallow ground water with compounds that include benzene, toluene, xylenes and ethylbenzne.

As with the USTs, no known effort has been made to locate possible buried unexploded ordinance, even though this has been recommended by the U. S. Army Corps of Engineers contractors.

The location of the machine gun range has not been verified or explored with regard to lead contamination. However our preliminary air photo review suggests there was a berm off the western end of the runways that may have been used for testing aircraft machine guns.

Because of the known and suspected hazardous materials characteristics of the Cotati OLF and its proximity to the proposed development to the west (including the proposed casino project) the U. S. Army Corps of Engineers in cooperation with the Sonoma County Environmental Health Division, the California Department of Toxic Substances Control, and the North Coast - Regional Water Quality Control Board should make it a priority to:

- ❑ Locate the USTs and explore the vertical and lateral extent of possible ground water contamination, especially with regard to benzene a significant constituent of gasoline and a known carcinogen. If present, this contaminant has the potential to impact existing and future water wells in the area and down gradient form the former USTs.

- ❑ Analyze soil and water samples for chlorinated solvents during the soil and ground water exploration for the USTs. This would be prudent since if present, chlorinated solvents could impact deeper ground water zones and impact the regional ground water resource. In addition further historical research, in conjunction with a soil gas screening survey should be done to determine locations of aircraft maintenance activities and identify related solvent waste disposal sites.

- ❑ Conduct the necessary research to locate/ verify the former machine gun range and undertake a through soil exploration and testing program. If this site is in the area of proposed future development there could be significant human health risks to construction workers and down wind residents due to lead dust exposure. Once the machine gun range is identified the area should be properly explored and sampled, and remediated before any development to mitigate this potential health risk. Based on the available information on the period of use of the range and the resulting amount of lead (as well as phosphorous from tracer rounds), remedial costs could be in the millions to 10's of millions of dollars, depending on the volume of soil and the area of dispersal.

- ❑ Conduct the necessary research to locate potential buried ordinance and remove and safely dispose of these materials if found. If these potential disposal sites are located in proposed development areas, they could pose a high risk to construction workers and subsequent facility occupants.

- ❑ The U. S. Army Corps of Engineers in conjunction with County and State agencies should make it a priority to conduct the necessary research to identify the locations of the reported and suspected hazardous materials impacts to the Cotati OLF, explore and define the extent of off site impacts to soil and ground water (deep and shallow) and conduct the necessary remediation. As development is encroaching on the undeveloped property in the area it would be prudent to locate and remediate any hazardous materials related to the former military activities as soon as possible. The time to conduct the needed research, investigation and possible remedaition could take a few to several years.

LIMITATIONS

This work has been performed in accordance with generally accepted environmental review practices for similar preliminary reviews conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

The scope of work performed to complete this preliminary information review was limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or wastes, we also must alert the reader that this review may not reveal hazardous materials releases that have occurred. Also, site conditions can change with time, and our assessment was not intended to predict future site and off site conditions. Because of the limited nature of this review, site history was developed based only on information provided and a review of limited government documents. This report is not a risk assessment and the Scope of Work provided does not include a determination of the extent of, nor the environmental or public health impact of, known or suspected hazardous materials or wastes.

It is understood by the parties hereto that the Client who has requested this review will use the report (in addition to other information) to provide information to local and state public agencies to assist those regulatory agencies in making decisions about development of property at and near the Cotati OLF. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of properties that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety.

CLOSURE

I trust the foregoing preliminary evaluation and opinions are sufficient for the State and County regulatory agencies to determine if they should, in the public interest, follow up on these environmental concerns. If you or the regulatory agencies involved have any questions, please give me a call.

Sincerely,
ENVIRONMENTAL GEOLOGY SERVICES

Marc W. Seeley, RG, REA-II
Principal Geologist

Reg Dir Has Copy
Dep Reg Dir
Reg Adm Ofcr
Route RPM CL 4/19
Response Required
Due Date
Memo Ltr
Tele

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, D.C. 20245

IN REPLY REFER TO:

APR 17 2002

Memorandum

To: Regional Directors and Agency Superintendents

Through: Deputy Assistant Secretary - Indian Affairs

From: Deputy Commissioner of Indian Affairs Sharon Blackwell

Subject: Processing of Mandatory Lands Into Trust Applications

This memorandum addresses how BIA realty staff should process mandatory land into trust applications. A determination that a statute is mandatory is made on a case by case basis. No clear definition of a mandatory statute currently exists. However, in order for a statute to be considered mandatory, the statutory language must include some restrictions on the Secretary's discretion in addition to the word "shall." The Regional/Field Solicitor's Office should issue a written determination that a statute is mandatory before the Bureau processes the application as a mandatory acquisition.

Once a determination is made that a statute is mandatory, certain provisions of the Part 151 regulations do not apply to the processing of the application. Most notably, the notice and comment provision of 25 CFR 151.10, where the agency notifies the local governments of the Tribe's application is not applicable and compliance with the National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 *et. seq.*, is not required.

In processing a mandatory trust acquisition, you must still comply with the remaining relevant portions of the Part 151 regulations. The first requirement is that the Tribe submit a request in writing that the land be placed in trust. The Tribe's resolution requesting that the land be taken into trust should cite the specific statutory authority mandating the acquisition. Even though NEPA compliance is not required, the BIA must conduct a contaminant survey on the lands to be acquired to ensure that no hazardous materials exist. 602 DM 2. The Bureau must also examine the title insurance to ensure compliance with the Department of Justice's Title Standards. 25 CFR 151.13. Even though an acquisition is mandated, the Department of Justice requires that lands to be acquired by the United States be free from liens and encumbrances.

After the contaminant survey and title review are completed, the Regional Director or delegated official should notify the Tribe of the approval of its request and that notice must contain the appeal

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provisions of Part 2 of the regulations. After the Part 2 appeal period has run (30 days) and if no appeal is filed, the Regional Director or delegated official must publish notice in the local newspaper of the decision to take the land into trust, pursuant to 151.12(b). That notice must state that a final agency determination has been made to take the land into trust and that the Secretary shall acquire title to the land no sooner than 30 days after the notice is published. 25 CFR 151.12(b). (*Note*: If the Assistant Secretary - Indian Affairs issues the decision to take land into trust, that decision is final for the Department (unless provided for otherwise in the decision), and no Part 2 appeal process is provided. After the AS-IA's decision is issued, the notice of final agency action is published in the FEDERAL REGISTER pursuant to 25 CFR 151.12(b)).

Any questions concerning the processing of mandatory applications should be directed to the Office of Trust Responsibilities, Central Office, (202) 208-5831.

NATIONAL INDIAN GAMING COMMISSION
2004 FEB 27 PM 2:55

990 Echo Ct.
Rohnert Park, Ca 94928

Feb. 23, 2004

Christine Nagle
NEPA Com. Indian Gaming
1441 L. Street
NW, 9th Floor
Washington, DC 2005

Honorable Christine Nagle Re: Graton Casino Project

As a citizen of Rohnert Park for the past 12 years I strongly oppose any casino in our city and I feel betrayed by 4 of the City Council Members because they held meetings behind closed doors and voted for a MOU without any public input. We have lost our democracy in Rohnert Park and have no strong representation in legislature. Lynn Woolsey has not represented us. Barbara Boxer's son is an attorney for the tribe and because of that she bowed out of the situation for ethical reasons. Dianne Feinstein has never once replied to any of my letters. This is America and I find the whole situation appalling. It is not against the tribe, but to the Station Casino in Las Vegas who will destroy the whole North Bays open space, and part of the Santa Rosa Laguna Preserve.

Please do what you can to help the majority of citizens who oppose this development.

Sincerely,
Eunice Edgington
Eunice Edgington
(707)588-8971

Law Office Of
MAURICE FREDERICKS
6950 Commerce Boulevard, Rohnert Park, California 94928
Telephone: (707) 795-5485 ♦ Fax: (707) 795-5486

February 25, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W., 9th Floor
Washington, DC 20005

Re: EIS Scoping Comments
Graton Rancheria Casino Project
National Indian Gaming Commission, Bureau of Indian Affairs
Hosted Public Hering - March 10, 2004
Luther Burbank Center, 50 Mark West Spring Road, Santa Rosa, CA

Dear Ms. Nagle and Honorable Members of the Commission:

The scope of the Naitonal Enviormetal Impact Statement for the proposed Indian Casino project to be located in Sonoma County should consider certain physical aspects of the selected site which render it inappropriate for the project.

Enclosed is the Sonoma County Assessor's plat of the site designated for the Graton Ranchera/Stations Casino gaming and hotel development The site is identified as Assessor's map Book 46 page 02. The lands shown on the assessor's map as Parcels 20, 21, 39 and 40 are currently vested in and assessed to Clement Carinalli and his wife as to an undivided one-third interest, and to Redwood Equities as to a two-thirds interest. They encompass 182 acre, allof the property to the north, the balance of the assessor map, approximately 76 acres, are currently vested in and assessed to Stanley John Poncia .

Note in particular the parcel marked Assessor's Parcel 17. This 160 foot wide flood control channel bisects the site from the Northeast to the Southwest. It effectively creates two distinct parcels of approximatly equal size. This parcel (17) is assessed to Sonoma County Water Agency and Flood Control District. A search of the records indicates that this channel is not merely an easement giving the Flood Control District the right to utilize the area for flood control, the parcel is actually deeded to the Water Agency which has fee title to the property. The only reservation in the deed whereby the property was conveyed to Flood Control, which would accrue to current abutting landowners, is the right to encroach upon this property for cattle and agricultural equipment crossing. (See the brief attached). The result of this is to create a barrier between the two parcels. The only means of access between the two parcels for vehicular and pedestrian traffic and by utilities is off site. This would require multiple encroachments on to public roads and place an inordinate traffic burden on abutting streets. It creates the need for duplicate water production and waist disposal facilities to adequately serve each separate site.

2004 MAR -2 PM 1:20

As the Sonoma County Board of Supervisors, who are, ex-officio, the directors of the water agency, has expressed their disapproval of this project, its devastating effect on the County's master plan and its readily apparent drastic incursion upon the environmentally sensitive Laguna de Santa Rosa, it would behoove the Water Agency to express its intention to allow no intrusions upon their flood control channel other than that allowed in existing easements.

Yours sincerely,

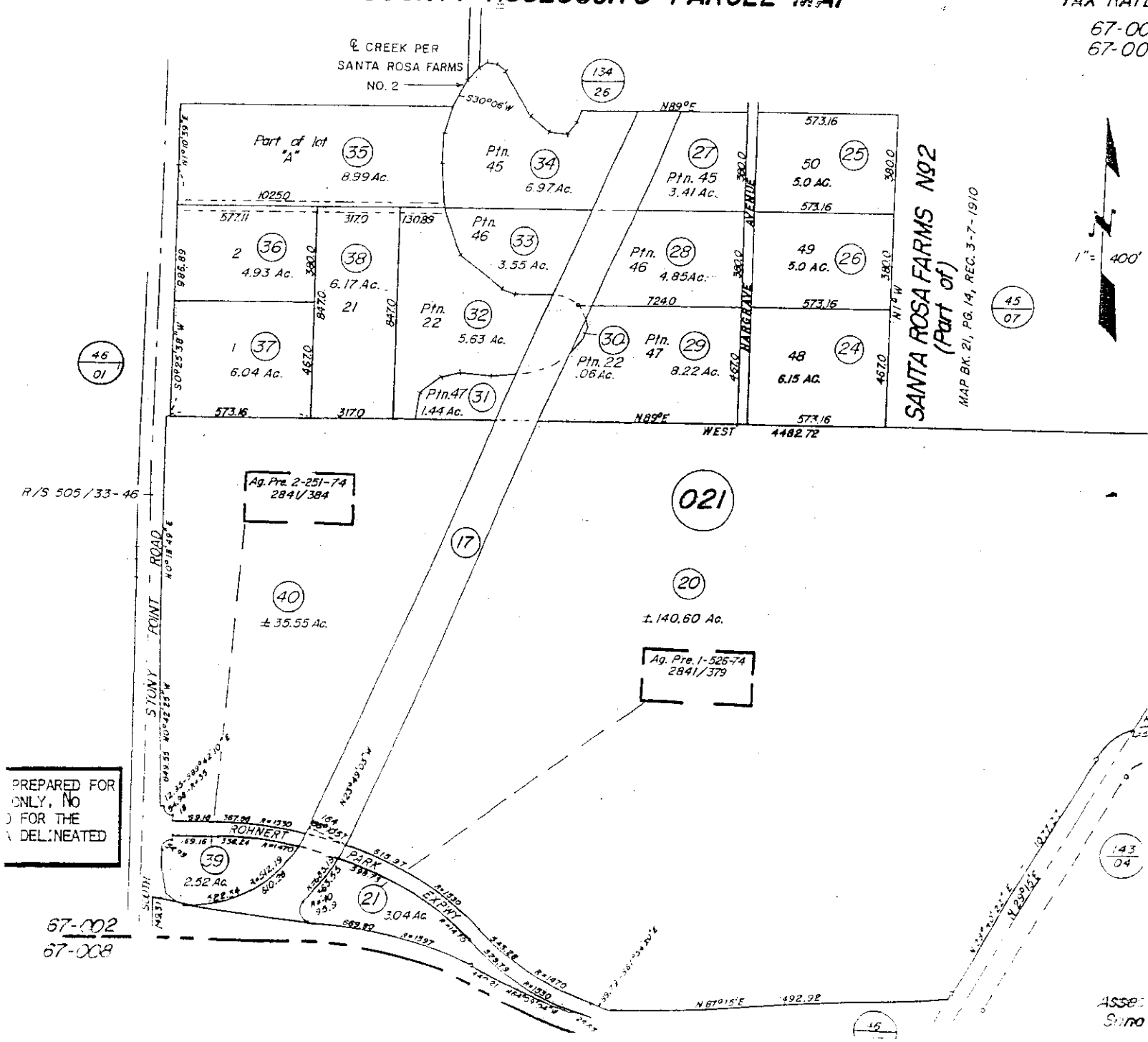
Maurice Fredericks

MF/ejs
Enclosure
cc: Sonoma County Board of Supervisors
Santa Rosa Press Democrat
Rohnert Park/Cotati Voice

Law Office Of
MAURICE FREDERICKS
6950 Commerce Blvd.
Rohnert Park
California 94928
Phone (707)
795-5485

COUNTY ASSESSOR'S PARCEL MAP

TAX RATE
67-00
67-00



INDIAN CASINOS

A Brief

1. Indian gaming is regulated by the US Government. (25 United States Codes (USC) §2701 ff).

2. Gambling, including "Bingo" (Class II Gaming) and Slot Machine operations, Blackjack, etc. (Class III Gaming) may be conducted on Indian lands. (25 USC 2701(5); 2710(d)(1)).

3. Indian lands are lands within an Indian reservation or lands held in trust by the United States for the benefit of any Indian tribe and over which an Indian tribe exercises governmental power. (25 USC 2703).

4. The Federated Indians of the Graton Rancheria (the tribe) has been restored to the status of a recognized Indian tribe with all amenities and rights accorded to a recognized Indian tribe. (25 USC 1300n-3 (a)).

5. The US Secretary of the Interior is required, on application of the tribe, to accept into trust for the benefit of the tribe, any real property in Marin or Sonoma County, California, which is conveyed to the Secretary of the Interior for their benefit or use. (25 USC 1300n-3(a)).

6. The tribe, under the sponsorship of STATIONS CASINOS, a corporation based in Los Vegas, Nevada (Station Casinos) and engaged in the gaming industry, proposes to acquire and convey to the Secretary, for the purpose of a tribal Indian gambling enterprise, certain real property located at the North East corner of Stoney Point Road and Rohnert Park Expressway within the County of Sonoma, State of California, described as Sonoma County Assessor Parcel Nos 046-021-020, 021, & 024 thru 040 (the site). (City of Rohnert Park Resolution No. 2003-233, accepting a Memorandum of Understanding between the city and the tribe). A copy of the assessors parcel map is attached as Exhibit "A" hereto.

7. Bisecting the site, from the North East to the South West is a flood control channel (the channel)designated as Sonoma County Assessors Parcel No. 046-021-017, fee title to which is vested in the Sonoma County Water Agency. Sonoma County Official Records, Document No. 2003099625.

8. Utilization of the real property constituting the channel is subject to no encroachment whatsoever, other than easements granted to adjoining land owners for "cattle and agricultural equipment crossing". A copy of said easement is attached hereto marked Exhibit "B".

9. Under information and belief it is alleged that the Sonoma County Water Agency has entered into no other agreements to convey the channel, or any interest therein, or rights to cross over, under or upon the same, or any other rights of encroachment thereto, to the tribe, Station Casino's, abutting land owners, or any other person or entity.

Law Office Of
MAURICE FREDERICKS
6950 Commerce Blvd.
Rohnert Park
California 94928
Phone (707)
795-5485

10. The Sonoma County Board of Supervisors is, ex-officio, the Board of Directors and ruling body of the Sonoma County Water Agency.

11. Unlike the State of California, the County of Sonoma is not required by federal statute to negotiate in good faith with the tribe concerning a compact regarding gaming on Indian land. (25 USC 1710 (d)(3)(A).

12. Any attempt by the tribe, or any other person or entity, to construct any facility for crossing over, under or through the flood control channel, other than for cattle and agricultural equipment, could be abated by action brought in the United States District Court for the Northern District of California. (25USC 2714).

13. The Board of Supervisors has adopted a resolution stating its refusal to negotiate with Station Casinos or the Tribe concerning mitigation of the adverse effects of locating a casino as envisioned by Station Casinos at the site.

THEREFORE, it is requested that the Sonoma County Board of Supervisors, acting at the Board of Directors of the Sonoma County Water Agency, advise the Federated Indians of the Graton Rancheria, their sponsor, Station Casino, the Governor and Governor Elect of the State of California, the Secretary of the Department of Interior and the Chairman of the Federal Indian Gaming Commission, that no encroachments upon their flood control channel will be tolerated;, other than crossing by cattle and agricultural equipment; and therefore, that the site chosen by Station Casinos for the tribe's proposed Indian Gambling Casino is inadequate and inappropriate for such use.

Dated at Rohnert Park, California, November 3, 2003.

Maurice Fredericks, Esq.
California State Bar #22991

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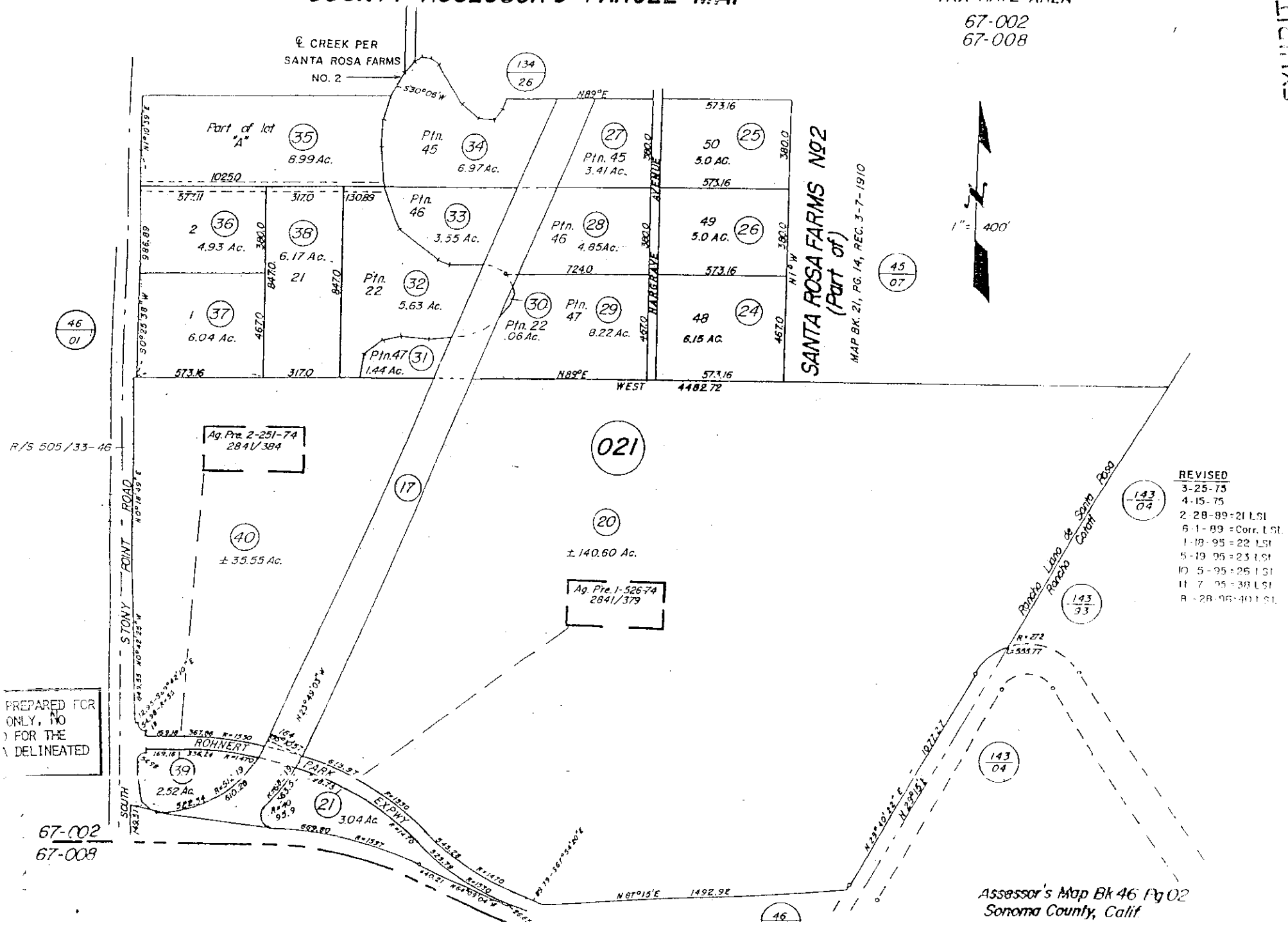
Rohnert Park
California 94928
Phone (707)
795-5485

COUNTY ASSESSOR'S PARCEL MAP

46-02

EXHIBIT A

TAX RATE AREA
67-002
67-008



E A S E M E N T

SONOMA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, a political subdivision of the State of California, Grantor, hereinafter referred to as "DISTRICT", does hereby grant to MANUEL T. PIMENTEL and MARY C. PIMENTEL, hereinafter referred to as "GRANTEE", their heirs, and assigns, an easement for a cattle and agricultural equipment crossing over the following described land situated in the County of Sonoma, State of California, and being more particularly described as follows:

Commencing at a ¾" iron pipe marking the Northwest corner of the parcel conveyed to Ralph J. and Jacquelin M. Ahl in Book 1053 of Official Records, Page 559 Sonoma County Records; thence N 17° 05' 39" E, 492.85 feet to a point in the centerline of a strip of land conveyed to the Sonoma County Flood Control and Water Conservation District by deed from Manuel T. Pimentel and Mary C. Pimentel recorded on Aug 15, 1961, in the Official Records of the County of Sonoma, under Recorder's Serial No. G 60050, said point being the point of beginning and having coordinates of Y 250,510.38 and X 1,787,157.58; thence from said point of beginning N 0° 54' 23" E, 154.50 feet to the northerly line of said strip of land; thence on the northerly line S 89° 05' 37" E, 120.00 feet; thence S 0° 54' 23" W, 309.00 feet to the southerly line of said strip of land; thence on said southerly line N 89° 05' 23" W, 120.00 feet; thence N 0° 54' 23" E, 154.50 feet to the said point of beginning.

The basis of bearings and coordinates for this description is the California Coordinate System, Zone 2.

The real property over which said easement is granted is a part of certain lands over which the District contemplates construction of channel improvements over a portion of the Laguna de Santa Rosa; District, therefore, grants the above described easement to said Grantee subject to the following limitations and conditions:

1. The Grantee shall have no right to use said easement in any manner which will interfere with the District's construction, maintenance and operation of said Laguna de Santa Rosa Channel improvements, and in particular Grantee shall not change said easement in elevation or alignment or place fences or obstructions restricting passage of water, without the prior written approval of the Chief Engineer of said District.

2. The District shall improve said easement by placing a rock surfaced ford on said easement but shall have no obligation to maintain improvements placed on said easement in any particular fashion or condition except as specified in Condition No. 3 hereinafter set forth.

RECORDED AT REQUEST OF
Manuel Pimentel
AT 37 MIN. PAST 12 P. M.
SONOMA COUNTY, CALIFORNIA
RECORDER
AUG 15 1961
OFFICIAL RECORDS
FEES $ 4.40 PD.

BOOK 1840 PAGE 284

G 60051

EXHIBIT B

3. Grantee expressly assumes the risk that District's maintenance of said Laguna de Santa Rosa Channel may at times render said easement difficult to use as a cattle and agricultural equipment crossing; District, however, hereby expressly promises Grantee that in the event that District's maintenance of the channel of the Laguna de Santa Rosa does at times so render the said easement difficult to use that District shall, within a reasonable time, restore improvements on the easement to the condition in which it was found at the time of the District's maintenance which rendered said easement difficult to use for a cattle and agricultural equipment crossing; provided, however, that District expressly excludes from said promise of restoration, damages caused by normal usage of the channel and further any flood damages which may occur to the said improvements.

In the event of abandonment of the use of said easement for a cattle and agricultural equipment crossing by Grantee, heirs and assigns of Grantee, said above described easement shall thereupon revert to said District, its successors or assigns.

IN WITNESS WHEREOF District has caused this grant of easement to be executed on this 12th day of June, 1961, by the Chairman of the District's Board of Directors on behalf of said District.

ATTEST:

Dorothy Larson
Asst. Secty., Bd. of Directors

SONOMA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

By: [signature]
Chairman, Board of Directors

STATE OF CALIFORNIA)
) ss.
COUNTY OF SONOMA)

On this 12th day of June, 1961, before me the undersigned, a Notary Public in and for the County of Sonoma, State of California, personally appeared Erle Shubert, known to me to be the person by law empowered to sign all duly authorized contracts, deeds, bonds, and other legal instruments in which the SONOMA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT is a party, in the name and on behalf of the District, and known to me to be the person who executed the within instrument on behalf of the said District, a political subdivision, therein named, and acknowledged to me that such District executed the same by Resolution No. 22934.

IN WITNESS WHEREOF I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

My Commission expires September 13, 1961.

A. Mary Wosick
A. MARY WOSICK, Notary Public in and for the County of Sonoma, State of California

END OF DOCUMENT

EXHIBIT B

711

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffer bach-Carle

www.Penngrove.Info

February 21, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W.
9th Floor
Washington,
DC 20005

Dear Ms. Nagle;

As you may be aware, The Federated Indians of Graton Rancheria and Station Casinos of Nevada have proposed a rather large casino complex near Rohnert Park in Sonoma County, California. I would like to emphasize the danger of establishing a federal water right on land already demonstrated in court to be in substantial groundwater overdraft. If this ill-conceived project is allowed to proceed as planned, it will create an inherently unstable legal climate and jeopardize the water rights of every single stakeholder in Sonoma County, including the Sonoma County Water Agency (SCWA).

The casino, which has already stated its intention to sink multiple one thousand foot wells, would almost certainly be drawn into the flurry of legal actions that have descended on this region of Sonoma County over the last four years. When, and or if, the casino is drawn into any legal fray, the U.S. Attorney General will be constrained to appear to defend that federal right. Federal involvement will dramatically increase the chance that the entire County is thrown into water adjudication.

It would be difficult to find a more inappropriate site for a casino (actually, for any large water consumer) than the one near Rohnert Park. The location is practically in the middle of a now-famous groundwater study conducted by PES Environmental, Inc. This study, part of a routine Rohnert Park EIR, proved compelling evidence in a successful lawsuit against Rohnert Park lodged by the South County Resource Preservation Committee, a suit and an organization out of which the O.W.L. Foundation grew.

Please consider the attached documents prepared by our attorneys which describe in more detail the water and the legal difficulties suffered by this particular region of Sonoma County. If you have any questions or would like more information regarding this matter, I can be reached at the telephone number or email address on the letterhead.

Sincerely,

H.R. Downs
President

2004 FEB 25 PM 2:36

P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

O.W.L. Foundation policy statement prepared by Ed Casey and Paeter Garcia,
Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, 16th Floor, Los Angeles, CA 90071 tel. (213) 576-1000

I. INTRODUCTION

An extremely large development project (Indian casino and hotel/retail center) is slated for an identified region of Sonoma County where groundwater supplies are already being critically overdrafted. *Clearly, a sufficient and sustainable water supply does not exist for the project*, particularly in light of the region's prevailing water crisis and the current and future water needs of local residents. For that reason alone, the project should not be allowed to proceed. However, the Casino project's sovereign status would make matters even worse. For instance, the project may seek to ignore state environmental protection laws and local water management efforts and, in the event of groundwater litigation, the project could unjustly obtain priority over longstanding water rights held and relied upon by local landowners, cities, water agencies, and the County.

For these and other reasons discussed below, the O.W.L. Foundation (Open Space, Water Resource Protection, Land Use) ("O.W.L.") urges that the Casino project should be denied.

II. BACKGROUND

O.W.L. is a non-profit organization headquartered in the community of Penngrove, Sonoma County, California. O.W.L.'s membership is comprised of residents throughout Sonoma County, including residents of Penngrove, who understand that immediate steps must be taken to avoid a disastrous outcome for one of their County's most precious resources – water – groundwater in particular.

Penngrove is situated in the valley floor west of the Sonoma Mountains, roughly between the City of Rohnert Park, to the North, and the City of Petaluma, to the South. Like many communities of Sonoma County, Penngrove has historically relied on local groundwater, including the Santa Rosa Plain Groundwater Basin, to provide a reliable water supply for its residents and agricultural industry. (See Attachment A.) However, in connection with the last two decades of increased urbanization in Sonoma County, that once reliable groundwater supply has been drastically overproduced and woefully undermanaged. In fact, federal, state, and local water agencies have all found that Sonoma County's groundwater resources are in serious jeopardy. Surface water supplies available to the County are equally strained, and a recent Court of Appeal decision confirmed that Sonoma County's water supply problem extends far beyond any quick-fix.

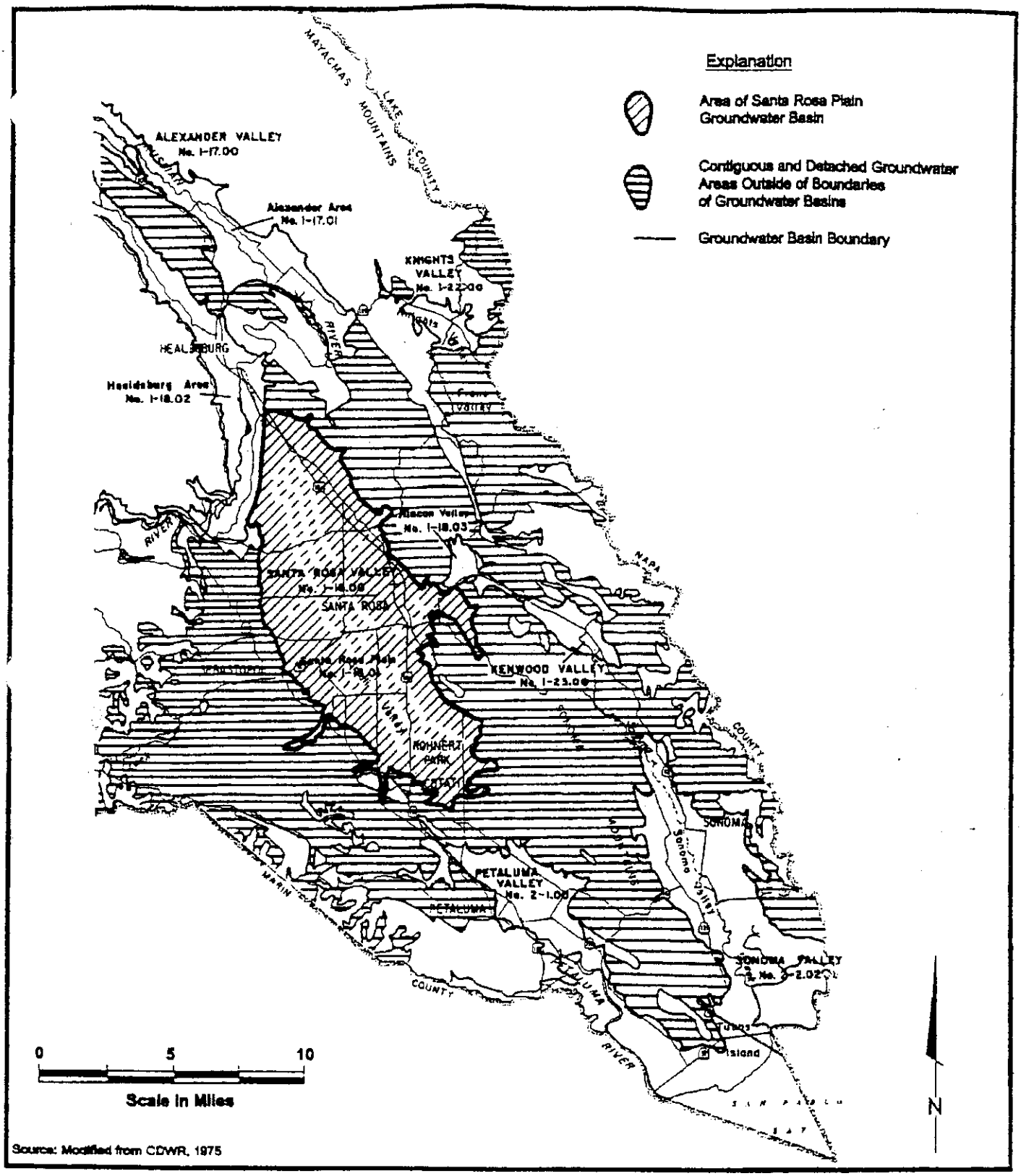
Notwithstanding this undeniable state of affairs, which could easily result in a complete public fiasco, the Sonoma County Water Agency, the County Board of Supervisors, and various municipalities have turned a blind eye to the County's water crisis and have determined to proceed with a host of new projects – including the Casino project – *without* being able to demonstrate that a sufficient, reliable, and sustainable water supply exists for those projects in light of the County's current and future water needs. (See pp. 12-13, below, regarding the proposed Casino project.)

III. WATER RESOURCE MANAGEMENT IS A PUBLIC RESPONSIBILITY

O.W.L. has stepped in and asked these public agencies to take a hard look at the consequences of their actions. For years, O.W.L. members have attended town hall forums, commission meetings, and city council hearings to voice their concerns about the looming water scarcity and about the impacts that local decision-making has on Countywide water resource management. O.W.L. has consistently presented an abundant variety of undisputable facts about existing and worsening conditions of groundwater basin overdraft and overall County water supply. (The entirety of reports, charts, maps, diagrams, and other relevant water supply information submitted by O.W.L. are not included with this letter, yet copies of that information can be provided upon request.)

A. Existing Groundwater Overdraft Must be Addressed and Resolved

1. Basin Overdraft is a Serious Problem



Source: Modified from CDWR, 1975

PES Environmental, Inc.
Engineering & Environmental Services

Figure 4.10-1
Location Map
Santa Rosa Plain
Groundwater Basin

Groundwater basin overdraft occurs when the rate at which groundwater is produced from a basin exceeds the average annual amount by which the basin is replenished by rainfall and percolation from other natural water sources. Overdraft is often defined as the condition resulting from the continual lowering of the level and gradual reducing of the total amount of stored water, the accumulated effect of which, after a period of years, renders the supply insufficient to meet the needs of the public. Prolonged overdraft can cause numerous long-term detrimental economic and environmental impacts. When a groundwater basin is in overdraft, groundwater users must often deepen their wells and install more powerful pumps to extract a sufficient supply of water from ever-greater depths of the basin. To that end, overdraft can also result in land subsidence, loss of surface vegetation and wetlands habitat, and severe degradation of groundwater quality. Perhaps most notably, however, overdraft causes injury to existing water rights and often leads to complicated and protracted litigation to adjudicate a basin's water supply.

2. Areas of Natural Recharge Must Be Protected

Groundwater overdraft can be corrected by taking steps to replenish a depleted basin and protect areas of natural recharge. For the most part, groundwater basins are recharged by natural percolation, where rainfall and other waters are allowed to collect and percolate down into the basin. This process typically occurs through stream beds or areas of open space with porous soil know as "areas of natural recharge." When areas of natural recharge are developed and covered by buildings, streets, sidewalks, and other non-permeable surfaces, natural basin replenishment cannot occur and groundwater overdraft is exacerbated. Once the recharge areas are gone, they cannot be replaced.

3. O.W.L. has Shown that Severe Overdraft Exists in the County and that Areas of Natural Recharge are Being Lost at an Alarming Rate

O.W.L. members have used publicly available information to show the County, the County Water Agency, and local municipalities that the Santa Rosa Plain Groundwater Basin and other adjoining groundwater basins are seriously overdrafted and further threatened by the continual loss of areas of natural recharge.

With regard to overdraft, O.W.L. has pointed to reports prepared by these agencies' own consultants to show the extent of the County's groundwater crisis. For example, in the southern portion of the Santa Rosa Plain Groundwater Basin encompassing the cities of Rohnert Park, Cotati, and northern Penngrove (Attachment B), annual recharge is approximately 1.6 million gallons per day ("mgd"), yet annual production in that area exceeds 5.0 mgd. This drastic overdraft of the basin has caused local groundwater levels to drop by as much as 150 feet. (See Attachments B and C.)

Indeed, in 2002, the Sonoma County Water Agency pumped 5.4 mgd from three nearby "emergency wells" (enough to supply about 30,000 urban customers) even though the Agency has not declared that any emergency exists. Even worse, the Agency produces this groundwater from rural areas of Sonoma County and sells and exports a substantial portion of that water to fuel urban growth in Marin County. As a result, rural Sonoma County residents near Sebastopol are beginning to voice concerns that numerous recent dry wells in their area are being caused by the Agency's excessive pumping from the "emergency wells."

Information published by the State Department of Water Resources ("DWR") clearly supports the conclusion that the region has fallen into serious overdraft. DWR indicates that the annual rate of groundwater production in the Santa Rosa Plain between 1960 and 1975 was *barely* in balance with the rate of groundwater replenishment for that same period (which is consistent with the City of Rohnert Park's EIR assessment for its General Plan, above; See Attachment C, Figure 4.10-2.) Similarly, as early as 1972, the United Stated Geological Survey ("USGS") characterized the majority of the Sonoma County groundwater basin complex as "marginal" or "inadequate" for municipal uses. However, by 1999, the City of Rohnert Park had increased its groundwater production to an annual average of 4.3 mgd in the Santa Rosa Plain Groundwater Basin, while recharge remained unchanged at an average 1.6 mgd. (See Attachments B and C.) Moreover, in 2002, the Sonoma County Water Agency increased groundwater pumping in the same region from zero to 5.4 mgd.

Equally telling, the U.S. Department of the Interior ("DOI") recently published a map in May 2003 of the Western United States entitled "Potential Water Supply Crises by 2025." The map identifies areas were "existing supplies are not

adequate to meet water demands for people, for farms, and for the environment." The DOI concludes that Sonoma County has a "substantial conflict potential" over water supplies and ranks the County's water resource crisis in the same category as the Klamath Basin, where farmers, tribes, and the federal and state government are locked in a bitter feud over limited water supplies and competing water rights.

With regard to areas of natural recharge, O.W.L. has pointed to maps prepared by DWR and USGS which specifically designate various lands in Sonoma County as being critical to groundwater recharge. The Sonoma County Planning Department uses these same maps to describe such lands as dedicated "areas of natural recharge." (See Attachment D.) The bed of the Russian River is also a key source of groundwater recharge for the County. Notably, DWR recently issued the following statement as number 4 on its list of 10 "Major Recommendations" in its 2003 Bulletin 118 Update:

- Groundwater management agencies should work with land use agencies to inform them of the potential impacts various land use decisions may have on groundwater, and to identify, prioritize, and protect recharge areas.
- Local planners should consider recharge areas when making land use decisions that could reduce recharge or pose a risk to groundwater quality.
- Recharge areas should be identified and protected from land uses that limit recharge rates; such as paving or lining of channels.
- Both local water agencies and local governments should pursue education and outreach to inform the public of the location and importance of recharge areas.

O.W.L. advocates for responsible growth and adheres to the simple proposition that development and transformation of dedicated recharge lands prevents basin replenishment and substantially limits the amount of groundwater supply available for residents' existing and future needs.

B. A Key Community Group Successfully Litigated Against the City of Rohnert Park for the City's Failure to Adequately Assess Groundwater Impacts

A key community group (which evolved into O.W.L.) first stood ground in 2002 when it filed a lawsuit against the City of Rohnert Park for violating the California Environmental Quality Act ("CEQA") through its failure to adequately analyze the impacts that City's General Plan Update would have on groundwater resources. The lawsuit resulted in a stipulated judgment which restricts the City's land use approvals in relation to existing overdraft conditions. For instance, the Judgment requires that any CEQA document prepared by the City for a project located outside of its 1999 boundaries must include (1) a determination of the project's water demand, (2) an analysis of whether the total projected water supplies available to the City during normal, dry, and multi-dry years during a 20-year projection will meet the projected water demand associated with the project, and (3) an identification of the water supply that is proposed to serve the project. The City is also prohibited from approving any project outside its 1999 boundaries whose net consumptive water use impact on the City's water supply will contribute to the City exceeding an average annual groundwater pumping rate of 2.3 mgd (half of the City's mean pumping rate between 1984 and 1999.) Notably, even this amount of groundwater production is at odds with the City's own General Plan concept of "safe yield" which clearly recognizes that the groundwater subbasin is only replenished at the average rate of 1.6 mgd.

Further, the 2002 Judgment required the City to amend its sphere of influence to remove 170 acres of land within the Penngrove Specific Plan that were previously added to the City's sphere. The City had intended to re-zone those lands from one home per 20 acres (which would still permit natural groundwater recharge) to various new zoning designations that would allow high density residential, commercial, and industrial development (which would transform the open permeable soil to impermeable hardscape and prevent groundwater recharge).

C. O.W.L. Convinced Sonoma County Representatives to Include Key Water Management Objectives and Policies in the County's General Plan Update

In 2003, O.W.L. participated in the public review process conducted by a Sonoma County Citizens Advisory Committee ("CAC") to accept comments on and develop a draft "Water Resources Element" for the County's General Plan Update for the

year 2020. While that process is still underway, O.W.L. was instrumental in guiding the CAC to develop key policies and objectives that are protective of existing groundwater resources and recharge lands and aimed toward responsible management of water resources generally on a Countywide basis. Some of the more critical provisions of the Water Resources Element are:

- The general objective of using only sustainable water supplies to satisfy future growth.
- The general objective of protecting existing recharge areas.
- The policy of denying discretionary development applications if cumulative development will cause or exacerbate groundwater overdraft.
- The policy of requiring study of proposed development projects and their potential impact on overdraft, land subsidence, and saltwater intrusion.

IV. A SERIES OF RECENT DEVELOPMENTS HIGHLIGHT SONOMA COUNTY'S CONTINUING WATER CRISIS

Numerous recent developments illustrate that the water resource crisis in Sonoma County has finally come to a head.

A. The Eel River Decision

In a May 2003 decision, the First District Court of Appeal held that the Sonoma County Water Agency did not comply with CEQA and overturned an EIR that the Agency prepared for its Water Supply and Transmission System Project to divert additional water from the Russian River for distribution to Sonoma County cities and other water purveyors. The Court determined that the Agency failed to account for a possible loss of Russian River water that may occur if PG&E's pending application to divert less water from the Eel River for its hydroelectric power plant is granted by a federal agency. Since such water diverted from the Eel River, in turn, feeds into the Russian River, less water will be available in the Russian for the Agency to take and distribute if PG&E takes less water from the Eel River.

The Court of Appeal stated that "[Sonoma County Water Agency's] failure to consider the impact of the potential curtailment of water from the Eel River has resulted in an EIR that fails to alert decisionmakers and the public to the possibility that the Agency will not be able to supply water to its customers in an environmentally sound

way." As a result of the Eel River decision, the Agency's plans to divert additional surface water from the Russian River are indefinitely on hold.

B. The Sonoma County Water Agency Admits that it Does Not Have an Adequate 20-Year Supply

In response to the Eel River decision, the General Manager for the Sonoma County Water Agency issued a letter in August 2003 stating that water suppliers (including local municipalities) that have contracts to receive water from the Agency should not rely on the delivery estimates contained in the Agency's 2000 Urban Water Management Plan, which indicated that water supplies available to the Agency would be adequate over the next 20 years. Unfortunately, many of the local municipalities had already approved development projects and land use plans in reliance on the information contained in the 2000 Urban Water Management Plan. In light of requirements under California's new water supply laws (SB 221 and SB 610; *See discussion below*), the Agency also issued the following admonishment:

> "[M]anagers of all public water systems relying on water diverted under the Agency's water rights must work together with local planning agencies to determine the extent to which additional supplies are available to each system for proposed new developments, given existing demand, existing approved development, the water remaining under the Agency's 75,000 afy limit and other supplies that each public water supplier may have available." [The Agency's delivery estimates before the Eel River decision were set in excess of 100,000 afy.]

The Agency also recommended that each water purveyor take certain steps to provide a meaningful assessment and monitoring of water demand, including: (1) immediately evaluate the expected future water demands for existing and approved development projects and provide the Agency and other Agency contractors with that information; (2) identify the source of water for those projects; and (3) evaluate the future water demands anticipated from proposed, but not yet approved, development projects.

Clearly, this admission by the largest surface water supplier in Sonoma County that it does not have a sufficient 20-year supply means that municipalities and water purveyors will look to increased groundwater production to serve the growth that

may have already been sanctioned under local general plan processes. However, as set forth above, that groundwater supply is already overdrafted.

C. The County of Sonoma Permit and Resource Management Department has Acknowledged Existing Groundwater Overdraft

In November 2002, the County's Permit and Resources Management Department ("PRMD") determined that unmitigated groundwater impacts would be caused by a particular development project proposed by the City of Rohnert Park. PRMD disapproved of the proposed project on three separate grounds, including:

- The water balance shows that this portion of the Santa Rosa Basin is in overdraft (recharge is estimated at 1900 afy, the City of Rohnert Park is removing 5,040 afy, and this project may remove as much as 193 afy).
- The estimated overdraft situation is confirmed by the City of Rohnert Park's General Plan 2000 which acknowledges a lowering of the water table in this area by 100 to 150 feet. (See Attachments B and C.)
- The Revised Rohnert Park General Plan speculation that the City will reduce its groundwater removal by up to 50% is unsupported by purchase contracts for more imported surface water.

These comments clearly illustrate the disharmonious relationship between the Eel River decision, the admission by Sonoma County Water Agency that available surface water supplies will be less than anticipated, and the looming trend by local municipalities to further rely on an already overdrafted groundwater supply.

D. The Kleinfelder Report

In September 2003, the "Kleinfelder Report" was issued. The Report was commissioned by the County Board of Supervisors and confirmed the long-foregone conclusion that particular study areas of the County's groundwater basin complex are experiencing serious water scarcity. The Kleinfelder Report concludes, in part, that "[a]dditional groundwater extraction is likely to increase the rate of overdraft and result in further decline of the groundwater levels. ... Levels will continue to drop as long as extraction exceeds recharge."

PRMD reported to the County Board of Supervisors that the findings in the Kleinfelder Report will need to be considered in connection with any new

discretionary applications in the study areas (e.g., subdivisions or use permits) because "at a minimum, the Report will constitute 'substantial evidence' under CEQA that a cumulative groundwater impact may exist ..."

V. VARIOUS WATER MANAGEMENT TOOLS ARE AVAILABLE TO ALLEVIATE THE COUNTY'S WATER CRISIS

While California does not have a statewide regulatory system for surface and groundwater management, various methods are available to protect and preserve those resources, including new water supply legislation, groundwater ordinances, and water management plans. If used properly, these tools can address and alleviate the water crisis in Sonoma County.

A. SB 221 and SB 610 Promote "Responsible Growth"

Effective since January 2002, California's water supply laws (commonly referred to as SB 221 and SB 610) impose strict requirements on certain development projects. Generally, projects subject to SB 221 and SB 610 are those containing 500 or more residential dwelling units, commercial or industrial projects that fall within certain size parameters, and projects that would have a water demand equivalent to a residential development project with 500 units or more.

In general, for any project subject to SB 221 and/or SB 610, the project cannot be approved unless the project proponent can provide verification from the local water purveyor that a sufficient water supply is available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand created by the project in addition to existing and planned future uses, including agricultural and industrial uses. Particularly relevant to Sonoma County, if the water supply for the proposed project includes groundwater, the purveyor must consider and analyze multiple factors concerning the condition of the supplying groundwater basin and its rights to extract such groundwater among other competing users.

B. Local Groundwater Ordinances Offer Solutions for Overdraft

Cities and counties in California have the authority to adopt groundwater ordinances pursuant to their police powers to protect the public, health, safety and welfare in areas that are not already regulated by the state. As California does not have a

uniform groundwater regulatory scheme, nearly half of its counties, and many cities, have adopted local groundwater ordinances.

The general intent of groundwater ordinances is to protect and preserve the viability of the existing groundwater supply. To that end, many groundwater ordinances focus on restricting projects insofar as they may adversely affect groundwater supplies, propose to export groundwater outside of the basin or county boundaries, degrade groundwater quality, or cause land subsidence. However, other groundwater ordinances have a broader scope, and are also geared toward managing groundwater resources for existing needs and planned growth.

Ordinances are typically implemented in connection with groundwater extraction permits, and center on whether the basin is operating within its "safe yield." Generally, safe yield is the amount of water that can be produced from a groundwater basin under a certain set of circumstances, over a given amount of time, without causing basin overdraft and without causing other adverse impacts.

O.W.L. has proposed the idea of using groundwater ordinances to the County Board of Supervisors, the County Water Agency, and various municipalities as a potential means of addressing and alleviating the impending water crisis in Sonoma County. To date, however, those agencies have not taken steps to craft or implement a new groundwater ordinance.

C. Groundwater Management Plans Can Harmonize Countywide Efforts to Preserve and Protect Water Resources

In 1992, the State Legislature adopted the "Groundwater Management Act" which is commonly referred to as AB 3030. (The Act is set forth by California Water Code Sections 10750 to 10755.4.) AB 3030 begins with the following proclamation by the Legislature concerning the protected status of groundwater:

> "The Legislature finds and declares that groundwater is a valuable natural resource in California, and should be managed to ensure both its safe production and its quality. It is the intent of the Legislature to encourage local agencies to work cooperatively to manage groundwater resources within their jurisdictions."

A groundwater management plan under AB 3030 may be adopted by any local agency, including municipalities, that provides water service, flood control, groundwater management, or groundwater replenishment. Pursuant to AB 3030, groundwater management plans address a wide range of management issues, including, but not limited to: (a) controlling saline water intrusion; (b) identifying and managing wellhead protection areas and groundwater recharge areas; (c) regulating migration of contaminated groundwater; (d) administering well abandonment and well destruction programs; (e) mitigating the effects of groundwater overdraft; (f) replenishing groundwater extracted by producers; (g) monitoring groundwater levels and water storage; (h) facilitating conjunctive use operations; (i) identifying well construction policies; (j) constructing and operating groundwater contamination cleanup, recharge, storage, conservation, recycling, and extraction projects; (k) developing relationships with state and federal regulatory agencies; and (l) reviewing land use plans and coordinating with land use planning agencies to assess activities that create a reasonable risk to groundwater resources and management.

O.W.L. has strongly advocated for the Somona County Water Agency to develop and implement a groundwater management plan. Recently, as part of its process to restructure the entitlement contracts to Lake Sonoma water in response to the Eel River decision, the Agency has more openly acknowledged the need to prepare such a plan. However, successful water management requires cooperation and "buy in" from surrounding agencies concerning efforts to moderate water production and conserve resources. That type of approach could easily be scuttled by the proposed Casino project.

VI. THE PROPOSED CASINO NEAR THE CITY OF ROHNERT PARK CONTRAVENES ALL ABOVE-MENTIONED PRINCIPLES OF WATER RESOURCE MANAGEMENT

Now that O.W.L. and other concerned members of the public are beginning to make progress with County and local decision-makers regarding water resource management, a new proposal is being made to locate a Las Vegas-style Indian gaming casino and hotel/retail complex just outside the city limits of Rohnert Park. Aside from the environmental impacts that this project would cause to various other County resources (i.e., wetlands, endangered species, growth inducing impacts), the

proposed Casino would drive a galvanized nail into the coffin of Sonoma County's water supplies.

Under federal case law (the "Winters Doctrine"), when an Indian reservation is established, "federally reserved water rights" attach to the reservation land for purposes of supporting the purposes and livelihood of the Indian Nation for which the reservation was created. The Winters Doctrine illustrates that federally reserved water rights enjoy powerful priority over pre-existing, state-based rights, and are protected against loss, interference, or injury. Indian water rights are protected pursuant to the trust relationship that exists between the federal government and Indian Nations. The federal government has an affirmative duty to protect the viability of these water rights and is subject to liability for failure to do so. Examples exist statewide of multi-million dollar settlements in favor of claims by Indian Nations that injury has been caused to their federally reserved water rights.

In light of the foregoing, serious implications could arise from the establishment of federally reserved water rights in the Sonoma County groundwater basin system. Given the groundwater overdraft and surface water problems that already prevail in the southern portion of the Santa Rosa Plain Groundwater Basin (*see discussion above*; Attachments B and C), those federally reserved rights would further jeopardize the ability of existing landowners and water purveyors to exercise their water rights. For instance, the well-documented overdraft in the Rohnert Park area already contributes to degradation to local water quality and has required surrounding water users to drill deeper wells. Water extracted for the Casino project would only magnify those problems. Moreover, overdraft conditions may result in a groundwater adjudication, where rights to produce groundwater now and in the future would be divided among landowners, cities, and other water agencies according to legal priority. Given the heightened priority that is afforded to federally reserved water rights, local landowners and agencies that have relied upon County groundwater for generations could be subject to enormous and irreparable harm.

In addition to those concerns, an Indian Nation would not likely be required to comply with CEQA, SB 221 and SB 610, a locally enacted groundwater ordinance, or a groundwater management plan due to its status as a sovereign nation.

Thus, despite whatever solutions may be crafted to address the County's water resource crisis, the Casino could be permitted to turn a blind eye and continue groundwater production, depletion, and mismanagement of the local groundwater basin.

As the Casino proposal is first dependent on the project site being designated as federal reservation land, O.W.L. has advocated for strict environmental review under the National Environmental Policy Act ("NEPA"), which applies to federal discretionary decisions that may "significantly affect the human environment." O.W.L. has argued that, at a minimum, the factors of (1) a critically overdrafted groundwater basin, (2) the Countywide surface water limitations under the Eel River decision, (3) the current Williamson Act designation of the proposed Casino site, and (4) the existence of multiple endangered species issues at the proposed site give rise to the need for thorough federal NEPA review before the proposed site is designated as a federal reservation.

VII. CONCLUSION

Many other groups and local citizens are objecting to the proposed Casino project on various legal, social, and environmental grounds. While supporting and concurring with many of those objections, O.W.L. is focused on the key point that any invitation to create a federally reserved water right in the local, overdrafted basin is an ill-conceived idea that would exacerbate the existing water crisis and contravene the water-related interests of the County, its cities, and all Sonoma County residents.

ATTACHMENT "A"

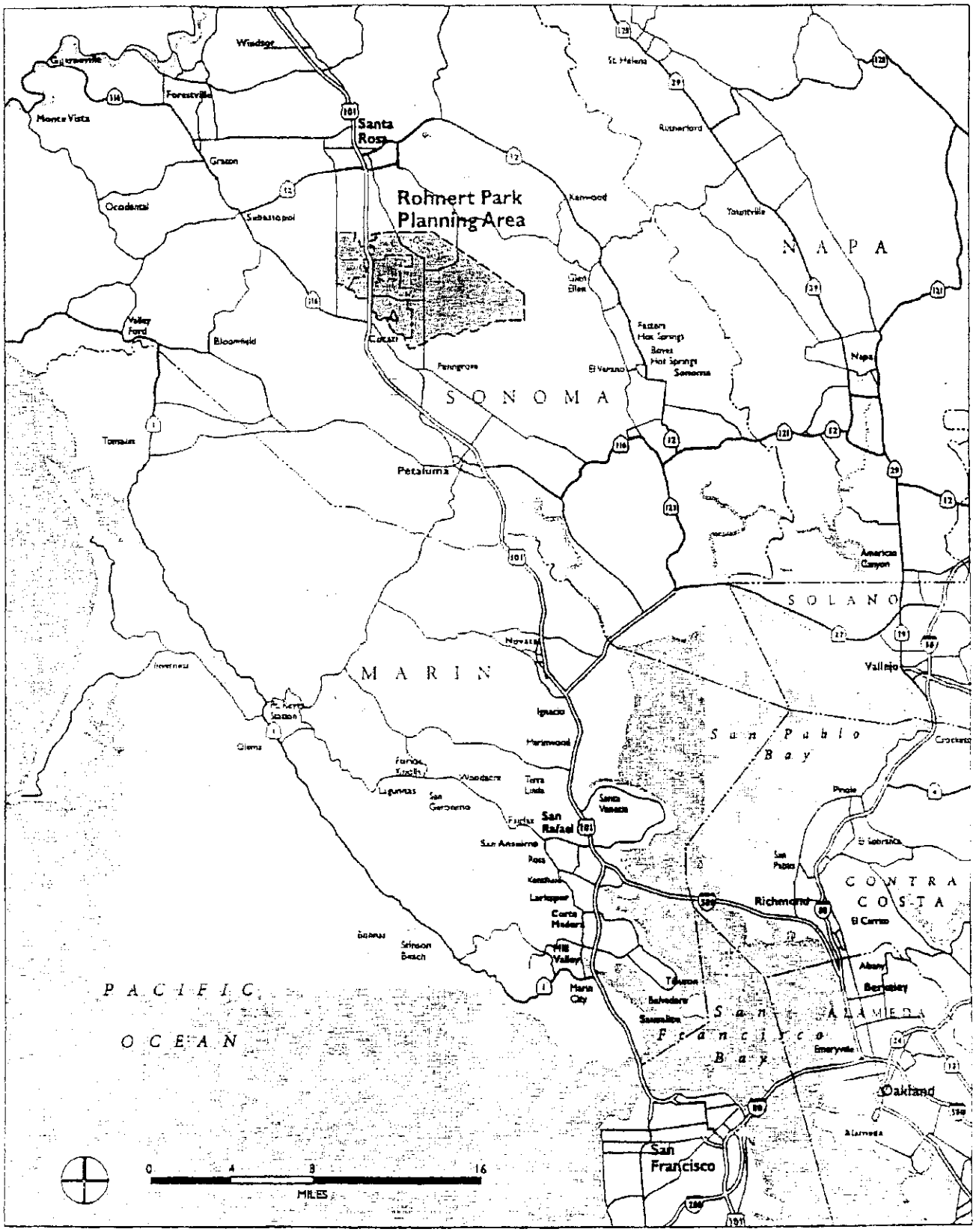


Figure 3.1-1

Regional Location

ATTACHMENT "B"

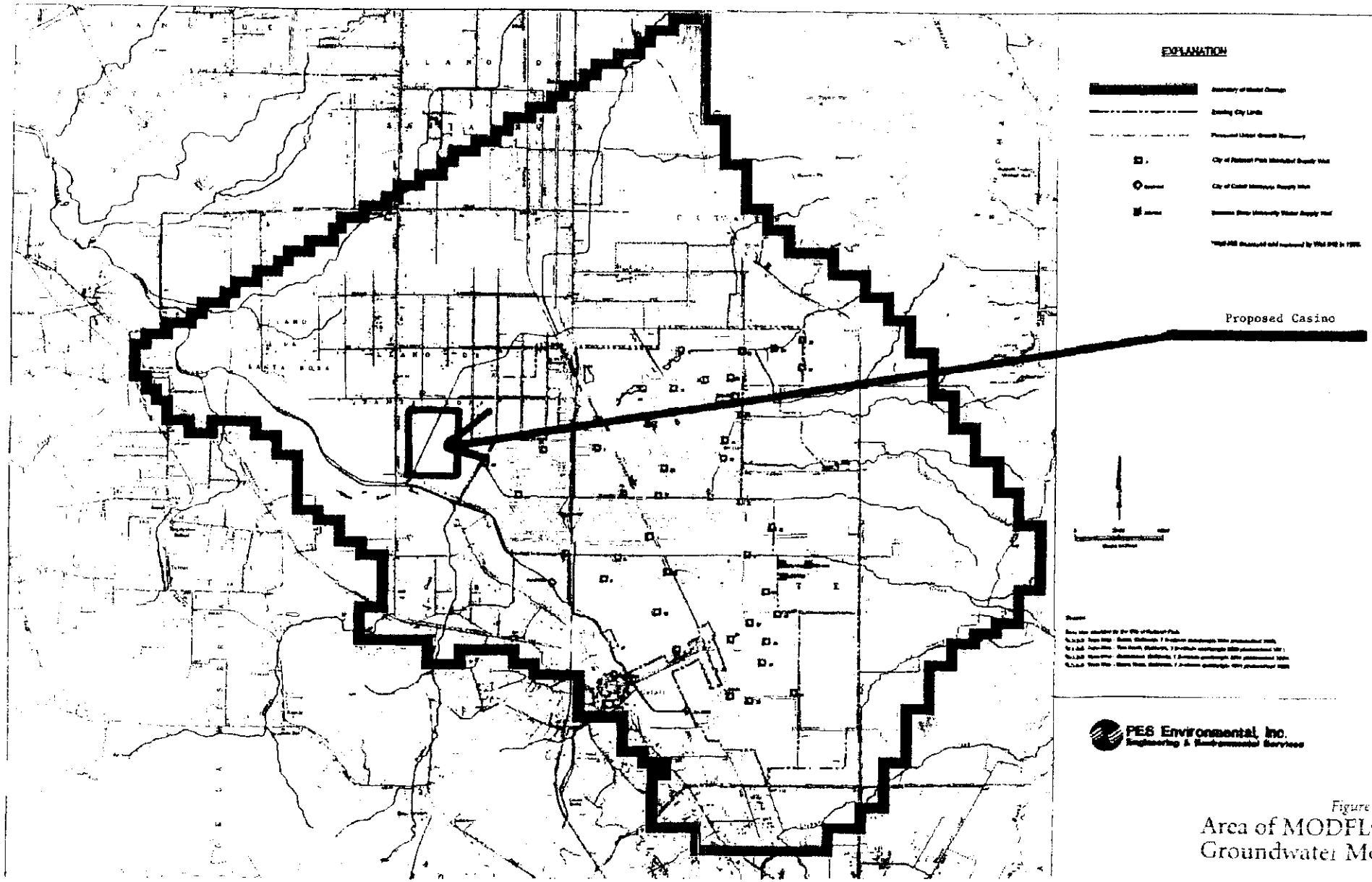
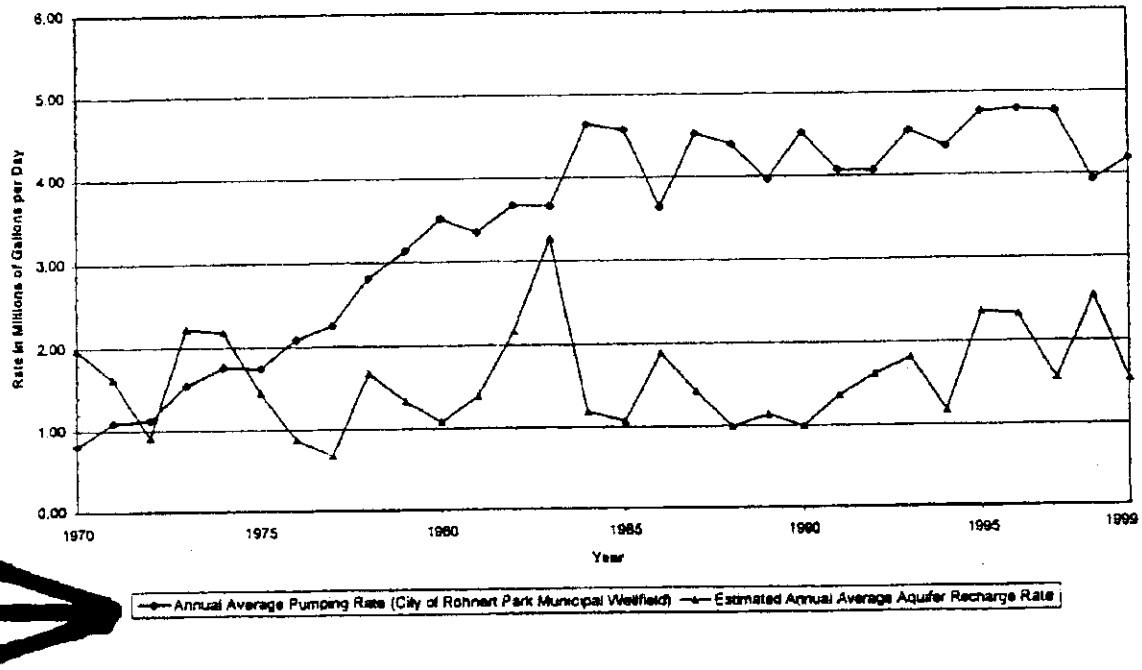


Figure 4.10-
Area of MODFLOW
Groundwater Model

Since at least 1966, it was less expensive for the City to pump groundwater as a source to supplement water-supply requirements, than to purchase water from the SCWA. However, over time, purchasing water from the SCWA became less expensive due to increased energy costs and capital and operation costs associated with maintaining a wellfield. Also, groundwater pumping has been affected by increasing well maintenance requirements. Hence, since the mid-1990s, the City has used additional SCWA water and relied less on their municipal wellfield; the excess well capacity serves as a back-up system in case of emergency situations or drought conditions. The annual average production rates for the City's municipal wellfield from 1970 through 1999 are shown graphically on Figure 4.10-2. The production rates range from an annual average of approximately 0.8 mgd in 1970 to 4.8 mgd in 1994.

Figure 4.10-2. Annual Average Rates of Recharge and Pumping
MODFLOW Groundwater Simulations
1970 through 1999



Sonoma County Water Agency

SCWA provides potable water to more than 500,000 people in Sonoma and Marin counties. Rohnert Park receives SCWA water from the Petaluma Aqueduct. The source of the aqueduct water is the Dry Creek watershed. Dry Creek water is captured behind Warm Springs Dam in Lake Sonoma. This water is released, and conveyed down Dry Creek to the Russian River, where it is then diverted into the SCWA basins.

- Compare estimated annual average recharge rates with requirements of the City's municipal wellfield in accordance with the schedule for the General Plan presented in Table 4.10-3.

Analysis of Impacts

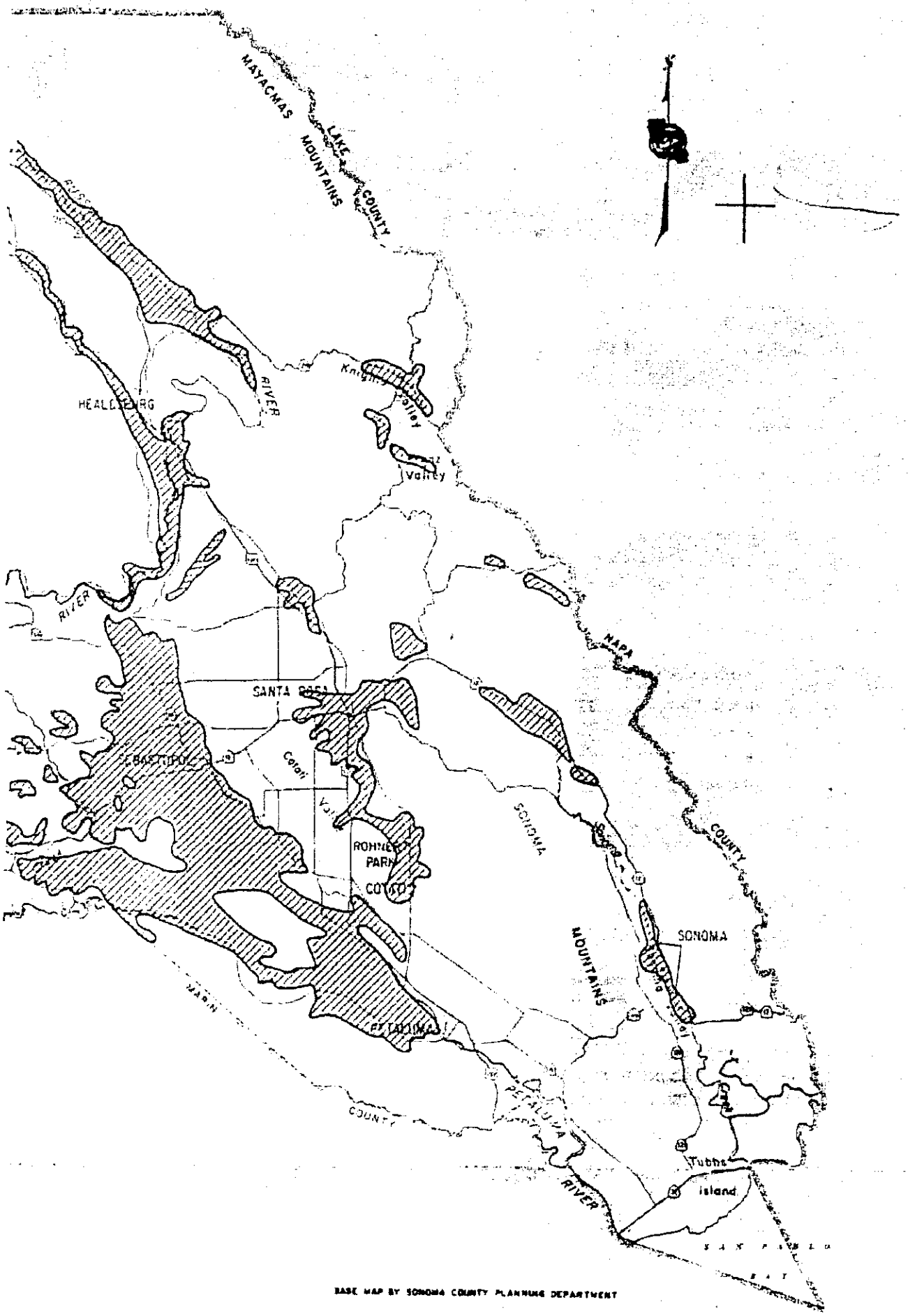
Impact 4.10-a: **Production of groundwater resources may result in the lowering of groundwater levels in the vicinity of the proposed Urban Growth Boundary.** (Significant)

Results of modeling simulations performed for 1952 and 1970 through 1999 indicate estimated annual average recharge rates within the model domain ranged from 0.66 mgd during the drought in 1977, to 3.28 mgd during a year of above average annual precipitation in 1983. Comparison of the range of estimated annual average recharge rates (0.66 to 3.28 mgd) with the City's municipal wellfield requirements during implementation of the General Plan (1.9 to 2.3 mgd as indicated in Table 4.10-3), indicates the potential for short-term impacts to occur during years of implementation from 2000 through 2009 if annual average recharge is less than 1.9 to 2.3 mgd. Annual average recharge would be less than 1.9 to 2.3 mgd if annual precipitation is less than 36 to 44 inches. The magnitude of the impact, if any, depends on the amount of precipitation in years 2000 through 2009. Any potential impact would cease commencing in the year 2010 when Rohnert Park's entitlement to water provided by the SCWA is planned to increase to the average rate of 15 mgd.

Comparison of the City's municipal wellfield requirements in accordance with Table 4.10-3 and the estimated average annual recharge rate (1.60 mgd) based on modeling simulations performed for 1952 and 1970 through 1999 indicates production requirements would exceed the average annual recharge rate by a range of 0.30 mgd in 2004, to 0.70 mgd in 2009. In comparison, historical production from the City's municipal wellfield has exceeded the estimated average annual recharge rate (1.60 mgd) by a range of 0.15 mgd in 1975, to 3.20 mgd in 1996. Historical production rates from the City's municipal wellfield over the past decade (1989 through 1999), have exceeded the estimated average annual recharge rate by a range of 2.36 mgd in 1989, to 3.20 mgd in 1996. Hence, although the impact of "groundwater overdraft" from the model domain area is potentially significant during the General Plan, the magnitude of the impact is substantially less in comparison to the past decade.

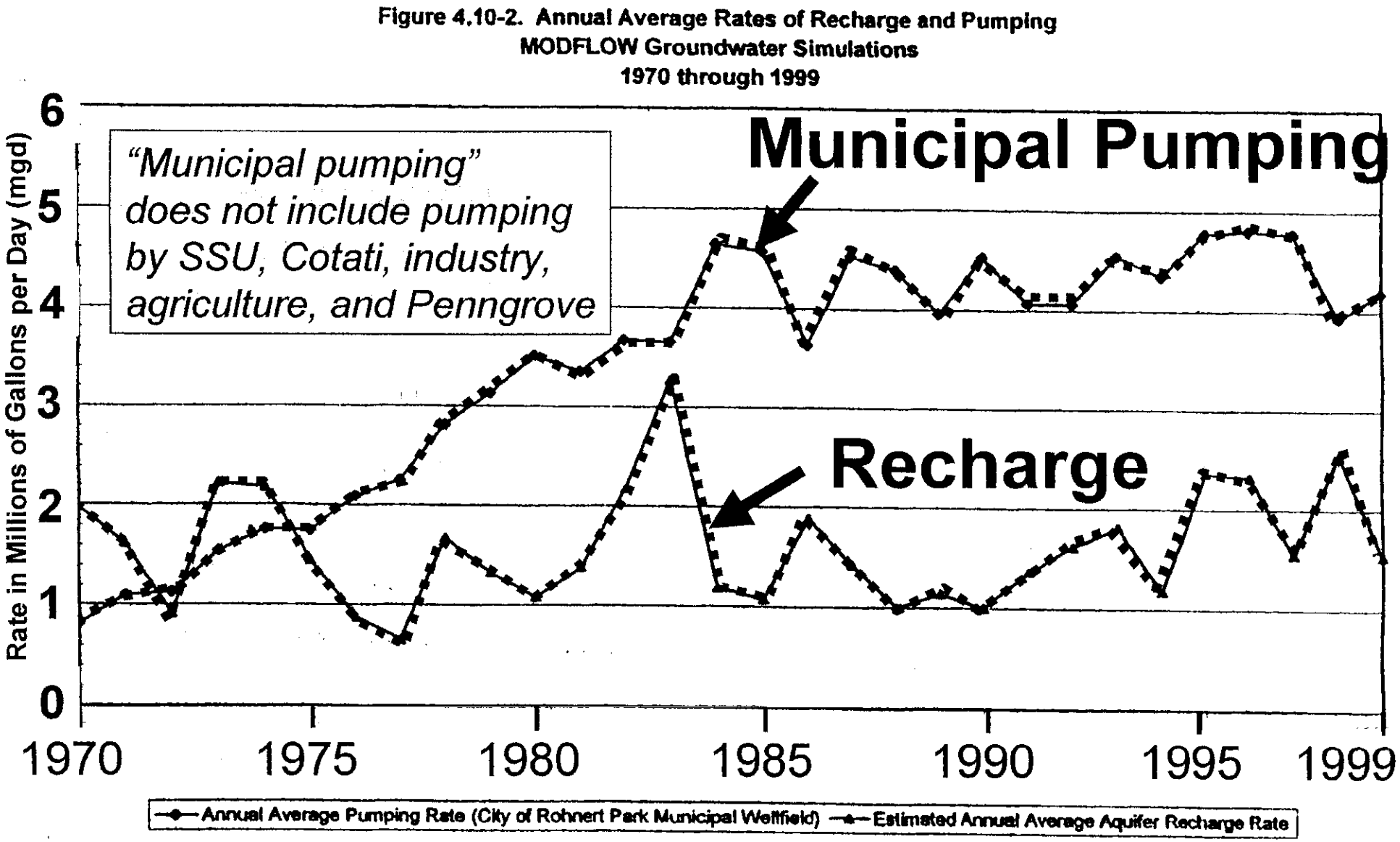
Further analysis of groundwater conditions within the proposed Urban Growth Boundary were performed based on comparison of historical groundwater elevations obtained from 1970 through 1999. In general, observed groundwater levels from 1970 to 1999 indicate the decline of groundwater levels ranges from approximately 35 feet in the northwest perimeter of the proposed Urban Growth Boundary, to approximately 100 to 150 feet along the eastern boundary. Under a reasonable worst case scenario of the City's municipal wellfield requirements in accordance with Table 4.10-3 and the estimated average annual recharge rate (1.60 mgd), the recovery of groundwater levels within the proposed Urban Growth Boundary is expected to begin during the year 2000 due to an increased interim SCWA allocation (as described above and listed in Table 4.10-3). With the increased allocation, wellfield production demand will decrease in comparison to the past decade. On the basis of demand

FIGURE 15

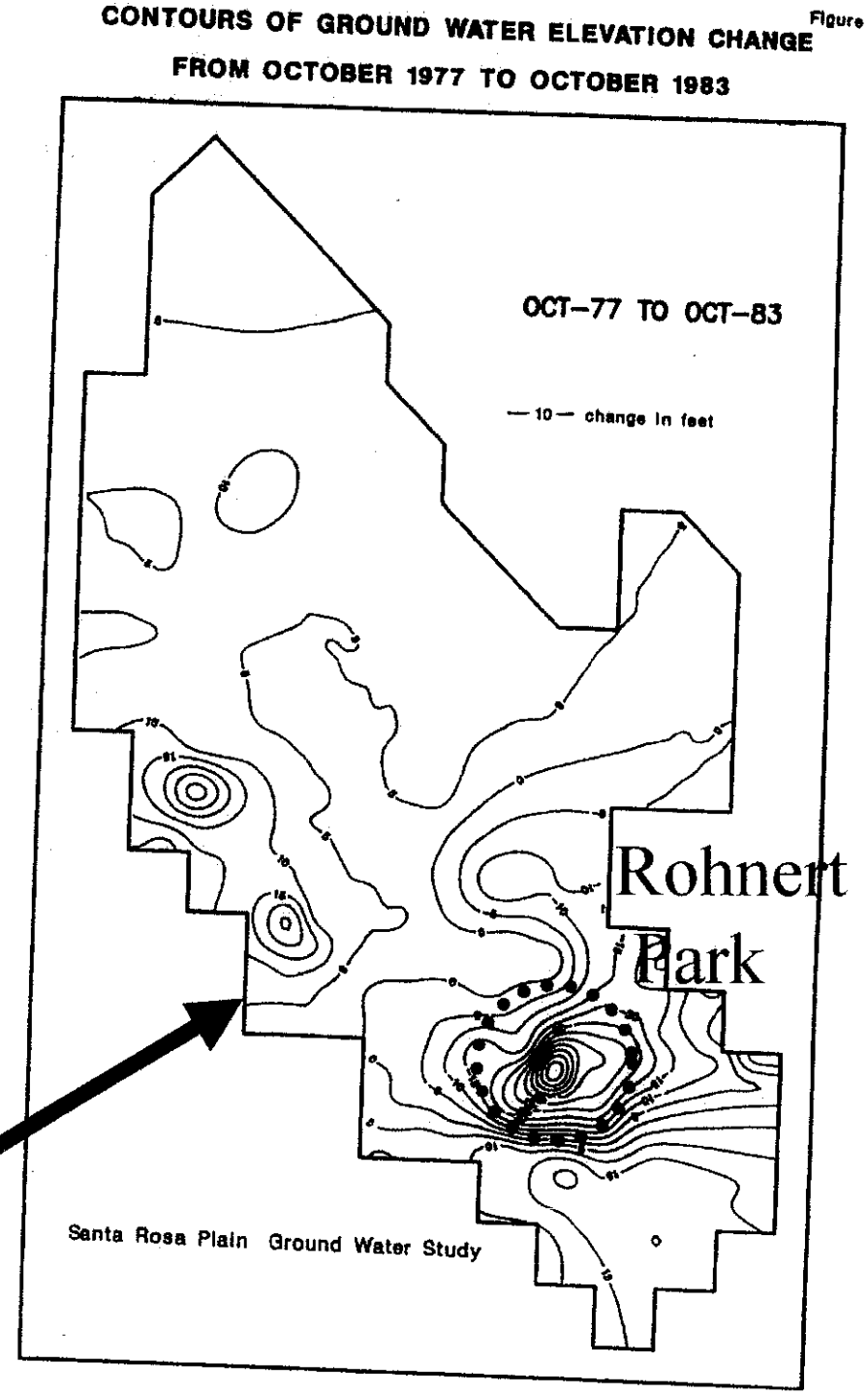


BASE MAP BY SONOMA COUNTY PLANNING DEPARTMENT

Rohnert Park's own EIR groundwater study indicates municipal pumping is 2 _ times greater than recharge.



Back in the 1980s, the California Department of Water Resources (DWR) identified a huge cone of depression centered in Rohnert Park.



Santa Rosa Plain Ground Water Study (1987)

March 10, 2004

Christine Nagle, NEPA Coordinator
National Indian Commission
1441 "L" Street, NW, 9th Floor
Washington DC

Re: DEIS SCOPING COMMENTS, GRATON RANCHERIA PROJECT

Dear Ms. Nagle:

This binder contains a number of letters from fellow physician colleagues who are adamantly opposed to the potential land transfer and casino near the Rohnert Park city limits.

This particular site should never be built upon for many reasons, including

- there are about 20 schools within a two to three mile radius
- there is currently severe traffic congestion in the immediate area daily
- the limit for sewer capacity is already surpassed in this area
- there are numerous wells already drying up in the immediate area
- the negative social impacts are well known; no financial resources to mitigate the gambling, drinking, drugs, prostitution, hunger and medical problems a casino would bring to our community
- site is a watershed, flood plane, permanent greenbelt, potential hazardous site
- it is wrong to give preferential treatment to any race of people
- at least 80% of the citizenship adamantly oppose the casino for the above reasons

Please take careful consideration of all the facts before granting a land transfer to the Graton Tribe – it is truly unfair to create a disaster and forever ruin a family oriented community.

Sincerely,

Kenneth C.Lamb, MD
979 Golf Course Drive #232
Rohnert Park, CA 94928
(707) 525-3777

cc: Gov A. Schwarzenegger/Mr. Peter Siggins
Senator Inoye
Senator Campbell

Lamb comment

This submission also included the following items, which have not been photocopied: 19 pages of newspaper clippings, an email copy of a letter to the editor and a copy of a Rhonert Park Council recall flyer.

MAURICE P. CARLIN, M. D., F. A. C. S.
A PROFESSIONAL CORPORATION
1120 MONTGOMERY DRIVE
SANTA ROSA, CALIFORNIA 95405

NEUROLOGY AND NEUROLOGICAL
SURGERY
545-4951
FAX: 526-1708

October 30, 2003

The Honorable Gale Norton
Secretary of the Interior

Dear Honorable Gale Norton:

Please note my wish to support the petition campaign to over turn the recently signed Memorandum of Understanding and would be essentially in opposition for the authority to grant the land transfer to allow for the casino to be built in the Rohnert Park area. This would cause significant and unnecessary increase in traffic congestion in the Stony Point Road/Rohnert Park area and adversely affect the present property owners.

Sincerely,

Maurice P. Carlin, M.D.

MPC:th

Office DEPOT.

Richard Auld, MD
1200 Sonoma Avenue Suite One
Santa Rosa, CA 95405
(707) 575-8570

10/30/03

Honorable Gale Norton
Secretary of the Interior

Ms Norton,

Please count me among the folks opposed to the Federated Indians of Graton Rancheria and their plans for a new casino in Rohnert Park Ca. The federal government can help by restricting tribal recognition, land transfers + compact agreements. It's one thing dealing w/ a large recognized (historically) tribe; quite another dealing w/ a group of 50 whose intent is to build a casino

Thank you

Richard

ROGER F. DELWICHE, M.D., INC.
1210 SONOMA AVENUE, SUITE B
SANTA ROSA, CALIFORNIA 95405

PHONE
(707) 544-5093
FAX (707) 528-8444

GASTROENTEROLOGY

November 9, 2003

The Honorable Gail Norton
Secretary of the Interior

Dear Ms. Norton:

I am writing to express my strong opposition to the establishment of a casino in Rohnert Park, California, by the Federated Indians of Graton Rancheria and their partners, Station Casinos. To date, the tribe has not taken possession of the property, and I urge you to use your much-respected influence to negate the proposal.

The location in Rohnert Park is particularly bad for several reasons: 1) the site is on Stony Point Road, an already heavily traveled road most of the day, and especially at rush hours and in the evenings; 2) the site is rural, a greenbelt separator, and the proposal is not only for a huge casino but also a 300 room hotel, which will impact the environment very adversely as well as eliminating any appearance of a greenbelt; 3) the city of Rohnert Park has grown rapidly over the past twenty years with major negative impact on the water table; the casino proposes further depleting water supply with numerous wells.

You should also know that there has been heavy anti-casino opinion expressed in the press and at a large public gathering at which the City Council expressed approval of a "memorandum of understanding" of the development. We are all quite aware that the lion's share of the revenues will go to Station Casinos, a Las Vegas based organization. Additionally, several very aggressive developers have become intermediaries by buying up the property in question only two weeks before the Council action. The circumstances are very suspicious at the very least—these individuals stand to reap an enormous windfall, tens of millions profit.

Many of the Native Americans in this area oppose the rampant proliferation of the casinos, and this one is felt to be remarkably offensive because of its location and size. My Native American friends have enlightened me of the following facts: 1) Gregg Sarris, the spokesman for the and "leader" of the tribe has not a drop of Native American blood; 2) Most of those on the governing board have spent much of their lives hiding the

fact that they **do** have a **miniscule** Native American heritage, but only now have gone public; 3) Only a small minority of the individuals in the tribes involved will actually receive any money from the casino. Such are some of the unpublisized inside facts.

Many of us take great umbrage with the manner in which this issue was sneakily and hastily announced to the public, almost as a fait accompli. Once again, I strongly urge you to use your very important influence to stop this development.

Please realize that the interests of the public have not been honestly addressed and leveled with in the course of this hastily presented issue. It seems clear that this was a contrived alternative for the proposal on Highway 37 and that, at the end of the day, this is all about money to Las Vegas interests and other insiders, rather the those of the public and even the tribe. Since the property has not yet changed hands, it is not in any way a reservation and therefore can be negated.

Thank you for your consideration.

Very truly yours,

Roger F. Delwiche, M.D.

SANTA ROSA SURGICAL ASSOCIATES

A MEDICAL CORPORATION

WILLIAM F. CRESS, M.D. • BRIAN F. SCHMIDT, M.D. • WALTER W. TOM, M.D.
RUSSELL W. SAWYER, M.D. • ALLEN W. CORTEZ, M.D. • ABDUL K. HARRIS, M.D.

10/28/03

Re: Rohnert Park Casino.

To whom it may concern;

I am totally opposed to a Casino in Rohnert Park or for that matter anywhere in California.

I staunchly oppose the gaming industry.

Sincerely,

William F. Cress MD

3536 MENDOCINO AVE., STE. 250 • SANTA ROSA, CALIFORNIA 95403
TELEPHONE (707) 579-2100 • FACSIMILE (707) 523-0616

Garry J. Kiernan, M.D
5875 Sonoma Highway #134
Santa Rosa, Ca 95409
(707) 537-8796

1/10/04
The Honorable Gale Norton
Secretary of the Interior
Fax # (202) 208-6956

To the Honorable Gale Norton-

We are writing to you to express our strong opposition to the building of a casino in Rohnert Park, CA by the Federated Indians of Graton Rancheria and their partners Station Casinos. We ask you to do everything you can to prevent the pollution of a wonderful city like Rohnert Park with an unnecessary and inappropriate business involving such a corrupting influence as gambling. Thank you for supporting our concern.

Nancy and Garry Kiernan

Garry J. Kiernan M.D.
Nancy Kiernan

L.R. DONDERO, M.D

DERMATOLOGY
LASER SURGERY
DERMATOLOGIC SURGERY

461 SEVENTH ST. WEST #3
SONOMA, CA 95476
(707) 938-1423
FAX # 938-2654

October 27, 2003

The Honorable Gale Norton
Secretary of the Interior

I am writing with regard to the Indian casino proposed for establishment in Rohnert Park in Sonoma County.

Three years ago, an initiative was passed in California enabling Indian casino gambling. This process is completely out of control. The proposed casino slated for Rohnert Park is out of place, in violation of the county's general plan, and widely opposed throughout the county.

When I voted for this initiative, I felt that it applied to significant existing Indian reservations only. Had I realized that long dormant tribes could be reincarnated and lay claim to new lands for the sole purpose of establishing casinos wherever they might choose, I would have voted against this initiative and likely campaigned against it.

While many people feel that Native Americans deserve a break, the current Indian casino situation in California amounts to a thinly veiled intrusion by Las Vegas gambling interests. A current widespread proliferation of these Las Vegas casinos is detrimental to most of the areas where they have been established producing increased crime, traffic, and antisocial behavior. The same will happen to our pleasant bedroom community of Rohnert Part if this casino is allowed to proceed.

This casino should be stopped now. Legislation should be carried that would allow for much greater oversight of Indian casinos. This legislation should prohibit land grabs of non-Indian lands for the purpose of casino gambling.

Sincerely,

L.R. Dondero, MD

LRD:lm

David W. Crotty, D.O. Osteopathic Physician

1211 College Avenue • Santa Rosa, CA 95404 Ph 707/544-4334 • Fax 707/544-9165

10/27/03

Dear elected officials:

The Honorable Gale Norton
The Honorable Lynn Woolsey
The Honorable Dianne Feinstein
Governor Arnold Schwartzenegger

Please do not support a gambling casino in our local bedroom / family community of Rohnert Park.

There are plenty of casinos within easy driving distance to the area - it is unnecessary + inappropriate to allow yet another casino into the area and specifically one into our residential areas.

Sincerely

David W. Crotty D.O.

James C. DeVore, M.D.
Gary N. Furness, M.D.

Theresa Wittenberg, P.A.-C.

4750 Hoen Avenue
Santa Rosa, California 95405
Telephone: (707) 523-2666
Fax: (707) 523-3399

October 28, 2003

To Whom It May Concern,

RE: ROHNERT PARK CASINO ISSUE

This is to state that I am strongly opposed to the proposed large casino in the area near Rohnert Park. It is appalling to me that the Federated Indians of Graton Rancheria would collaborate with Las Vegas gambling interests to plan such a project in Sonoma County with no regard whatsoever to zoning issues, environmental issues and the wishes of the community. I do understand that the legal and political issues surrounding issues are complex but please take whatever action is necessary to strongly oppose this project.

Sincerely yours,

James C. DeVore, M.D.

JCD:ss

cc: Hons. Lynn Woolsey
Hons. Dianne Feinstein
Hon. Gail Norton
Gov. A. Schwarzenegger

Sutter Medical Center
of Santa Rosa
A Sutter Health Affiliate

Family Practice Center
3320 Chanate Road
Santa Rosa, CA 95404
(707) 576-4100

10-28-03

To Whom It May Concern:

I oppose the placement of a large casino and entertainment center in a residential neighborhood of Rohnert Park.

Sincerely,

Deborah Donlon M.D.

CHRIS KOSAKOWSKI, MD DAVID ELLIOTT, MD
GENERAL & VASCULAR SURGERY

29 October 2003

The Honorable Gale Norton
Secretary of the Interior
Washington, DC

RE: Proposed casino in Rohnert Park, CA

Dear Ms. Norton:

I wish to make my stand clear that I am firmly opposed to the development of a casino by the Federated Indians of Graton Rancheria in nearby Rohnert Park, California, here in Sonoma County.

Such a facility as this large casino will have a significantly negative impact on the community. This area of Sonoma is a quiet, agrarian, friendly part of the country. This casino will turn our county into a mob-infested haven for organized crime, promoting corruption, vice, and a general denegration of the moral values we hold dear among our families in this treasured, peaceful community.

Moreover, the added pressure of increased people and traffic concentrated in such a small, focused area of the county will add to the likelihood of traffic accidents, violence, pollution, and general deterioration in neighborhood quality of life.

As much as I am an ardent advocate for rights of Native Americans, I feel this facility is wrong for this community at this time, and strongly urge opposition to the proposed Rohnert Park casino.

Thank you for your consideration.

Kindest personal regards,

David C. Elliott, MD, FACS

3536 MENDOCINO AVE. SUITE 360 • SANTA ROSA, CA • 95403
PHONE: (707) 579-5520 • FAX: (707) 579-8820

October 30, 2003

Honorable Gail Norton
Secretary of the Interior
Washington D.C.

Dear Honorable Gail Norton:

I am writing to express my opposition to the proposed casino and entertainment center in Rohnert Park, California. I realize that this might be a positive benefit for the owners, but it provides minimal value to the surrounding community. In addition, the surrounding community (of which I am a part) must provide all the infrastructure and deal with all of the disruption, crime, and stress that comes with such a facility. I also feel that the location is highly inappropriate.

Thank you very much for your attention to my letter.

Sincerely,

Diane C. Heimann
3484 Phillips Ave
Santa Rosa, CA 95407

ALLAN S. HILL, M.D.

555 PETALUMA AVENUE, SUITE C
SEBASTOPOL, CALIFORNIA 95472

October 30, 2003

The Honorable Gale Norton
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

RE: Rohnert Park Casino

I am writing to you today because I oppose the "Rohnert Park" casino and entertainment center being currently proposed for construction in Sonoma County near Rohnert Park city limits. This is a development that would be done under the auspices of the Federated Indians of Graton Rancheria.

I am taking this time from my practice to write to you because I am tired. I am tired of being a California native that has seen our interests in preserving the balance between growth and the environment overshadowed by financial pressures. The issue with this development is not about Indian rights. What is happening here is that the Nevada gaming facilities are using the Indians to expand into the lucrative California market. While I think the Indians are due their full rights to develop their lands, I feel that in this case, the development will benefit the outside investors more than it will benefit the Indians for whom it is supposedly designed.

This large development is slated to cover up an area of relatively undisturbed wetlands. It will also place a strain on the ability of the county to provide fresh water at a time when our new sources of drinking water are limited. This proposed development is also different from other casino proposals in that it would occur in an area on the border between an urban and rural district contrary to the Sonoma County General Plan. This area currently faces traffic congestion and the casino would place high demands on already over taxed county and city infrastructures.

I think the people who stand to gain in this development are outside interests and that it runs against the desires of the local population and the concerns for the environment. We who live here need you to oppose this project.

Sincerely,

Allan S. Hill, MD

PHONE: (707) 829-8426
FAX: (707) 829-6675

Eye Physicians and Surgeons

J. Earl Rathbun, M.D.
Ophthalmic Plastic and Reconstructive Surgery

James E. Hunt, M.D.
Cataract and Glaucoma Surgery
Corneal Transplants

A Professional Corporation
100 Brookwood Ave.
Santa Rosa, CA 95404
707-523-2530
707-523-1037 (fax)

November 7, 2003

The Honorable Gale Norton
Secretary of the Interior

Dear Mr. Norton:

I am opposed to the development of a large casino and entertainment center in Rohnert Park, California.

Sincerely,

Jim Hunt, MD

PRIMARY CARE ASSOCIATES
OF THE REDWOOD EMPIRE

FAMILY PRACTICE

☐ **Cherry Street:**
500 Doyle Park Dr.
Suite 200
Santa Rosa, CA 95405
Phone: (707) 545-1300
Fax: (707) 545-0823

☐ **Rohnert Park:**
1450 Medical Center Dr.
Suite 3
Rohnert Park, CA 94928
Phone: (707) 584-8588
Fax: (707) 584-2869

☐ **Spring Creek:**
1144 Sonoma Ave.
Suite 119
Santa Rosa, CA 95405
Phone: (707) 544-3811
Fax: (707) 544-0128

PEDIATRICS

☐ **Peds Doyle Park:**
500 Doyle Park Dr.
Suite 100
Santa Rosa, CA 95405
Phone: (707) 544-6090
Fax: (707) 544-2389

☐ **Peds Farmers Lane:**
255 Farmers Ln.
Santa Rosa, CA 95405
Phone: (707) 545-2255
Fax: (707) 545-0456

ADMINISTRATION

☐ **PCA Administrative Office**
1450 Medical Center Dr.
Suite 2
Rohnert Park, CA 94928
Phone: (707) 584-0313
Fax: (707) 588-2940

From: Michael L. Ismail, MD
500 Doyle Park Dr.
Santa Rosa, CA
95405
Phone: (707) 545-1300
Fax: (707) 545-6354

Date: 10/29/03

Re: Rohnert Park Casino

I am one of many Sonoma county residents who are appalled at the construction of a local casino. I understand the desire to bow to Native American interests given the incredible suffering and hardship our nation has inflicted upon them. I do not, however, believe that ANY group should be given the right to ignore our nation's laws and regulations, zoning included. A casino isn't going to draw local residents flocking to support a local business. This casino is going to draw non county residents driving in specifically to gamble. They would come whether the casino is placed in a strip mall, on reservation land, or built on top of Spring Lake Park which we could fill in and cover with asphalt specifically for that purpose. This is an improper use of land which should be stopped whether in Sonoma county or any other. This location is not necessary for the success of this type of business. It will be a cancer in whatever community it is placed. It should at least be placed somewhere where its damage to the surrounding area will not be so significant.

Sincerely,

Michael L. Ismail, MD

cc: L. Woolsey
D. Feinstein
B. Nordin
A. Schwarzenegger

"Treating each patient as our only patient"

Redwood Regional Oncology Center
Comprehensive Cancer Care

3555 Round Barn Circle
Suite 100
Santa Rosa, California 95403

Phone (707) 528-1050
FAX (707) 525-3874

Radiation Oncology
Ralph B. Hanahan, MD

Medical Oncology/Hematology
Ian Anderson, MD • Wes S. Lee, MD, PhD
L. Wayne Keiser, MD • Rose Cook, FNP, RN, MS

October 28, 2003

Honorable Gail Norton
Secretary of the Interior
Washington DC

Dear Honorable Gail Norton:

I am writing to express my opposition to the proposed casino and entertainment center in Rohnert Park, California. I realize that this might be a positive benefit for the owners, but it provides minimal value to the surrounding community. In addition, the surrounding community (of which I am part) must provide all of the infrastructure and deal with all of the disruption, crime, and stress that comes with such a facility. I also feel that the location is highly inappropriate.

Thank you very much for your attention to my letter. If you would like to contact me, please call me at the number noted on my letterhead.

Sincerely,

L. Wayne Keiser, M.D.

LWK:lr

cc: Kenneth Lamb, M.D.
979 Golf Course Drive, #232
Rohnert Park, CA 94928

D: 10/28/03
T: 10/29/03

Ron Kennedy, M.D.
2448 Guerneville Rd., Suite 800
Santa Rosa, California 95403

Tel. (707) 576-0100 FAX: (707) 576-1292 E-mail: ***nexus@sonic.net***
www.medical-library.net

November 7, 2003

The Honorable Gale Gordon
Secretary of the Interior

Dear Ms. Gordon:

I am writing in relation to the proposed Indian casino in or near Rohnert Park, CA. I find this utterly abhorrent, a certain degeneration of the moral and economic fiber of my community. I urge you to deny land transfer for this casino anywhere in Sonoma County. This is our home. We do not want uninvited rabble coming here to gamble.

Sincerely,

Ron Kennedy, M.D.

Ron Kennedy, M.D.

William F. Kivett, M.D., F.A.C.S.
Board Certified, Plastic Surgery,
Facial Plastic Surgery & Dermatology
1210A Sonoma Avenue, at Doyle Park · Santa Rosa, CA 95405-6621
707 579 9200 · www.BeautyandHealth.net

10/31/03

The Honorable Gail Norton, Secretary of the Interior

Dear Ms. Secretary,

There is a proposed casino and entertainment center in Rohnert Park, California. The presence of this casino is unacceptable in our community for a variety of reasons. I fully oppose its establishment. Please do whatever you can to stop this development.

Sincerely,

William F. Kivett, M.D., F.A.C.S.

LARRY MARIANELLA, M. D.
A PROFESSIONAL CORPORATION
INTERNAL MEDICINE
1515 MONTGOMERY DR.
SANTA ROSA, CALIFORNIA 95405

TELEPHONE (707) 526-4866

10/29/03

Hon Gale Norton
Secretary of the Interior

Dear Secretary Norton:

The proposed Indian Casino in Rohnert Park is not in the best interest of the citizens of Sonoma County with anticipated downside to personal and general community health.

I urge you to oppose the creation of the contemplated Casino.

Sincerely,

J Marianella MD

Family & Internal Medicine

Roger G. Nacouzi, MD
(707) 546-5675

Stephanie L. Nacouzi, MD
(707) 546-5686

October 31, 2003

The Honorable Gale A. Norton
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Lynn C. Woolsey
United States Representative
1101 College Avenue, #200
Santa Rosa, CA 95404

The Honorable Dianne Feinstein
United States Senator
One Post Street, Ste. 2450
San Francisco, CA 94104

Governor Arnold Schwarzenegger
State Capitol
Sacramento, CA 95814

Dear Gentlepeople:

This letter is written in order to express our opposition to the proposed construction of the casino and entertainment center in Rohnert Park. Such a proposal is not in the interest of the people living in Rohnert Park and Sonoma County. We want you to vote against such a proposal.

Thank you for your attention to this matter.

Sincerely yours,

Roger Nacouzi MD
S. Nacouzi MD

Drs. Roger and Stephanie Nacouzi

RGN: lmp

Creekside Medical Plaza, 95 Montgomery Dr., Suite 120, Santa Rosa, CA 95404 • FAX (707) 546-5685

October 30, 2003

Honorable Gail Norton
Secretary of the Interior
Washington D.C.

Dear Honorable Gail Norton:

I am writing to express my opposition to the proposed casino and entertainment center in Rohnert Park, California. I realize that this might be a positive benefit for the owners, but it provides minimal value to the surrounding community. In addition, the surrounding community (of which I am a part) must provide all the infrastructure and deal with all of the disruption, crime, and stress that comes with such a facility. I also feel that the location is highly inappropriate.

Thank you very much for your attention to my letter.

Sincerely,

Walter R. Potter Jr.
3484 Phillips Ave
Santa Rosa, CA 95407

October 30, 2003

Honorable Gail Norton
Secretary of the Interior
Washington D.C.

Dear Honorable Gail Norton:

I am writing to express my opposition to the proposed casino and entertainment center in Rohnert Park, California. I realize that this might be a positive benefit for the owners, but it provides minimal value to the surrounding community. In addition, the surrounding community (of which I am a part) must provide all the infrastructure and deal with all of the disruption, crime, and stress that comes with such a facility. I also feel that the location is highly inappropriate.

Thank you very much for your attention to my letter.

Sincerely,

Claudia J. Potter
3484 Phillips Ave
Santa Rosa, CA 95407

Louis E. Pelfini, M.D.

A PROFESSIONAL CORPORATION
108 LYNCH CREEK WAY, SUITE 4
PETALUMA, CALIFORNIA 94954

TELEPHONE (707) 763-6807

29 Oct 03

Ken

Here's a check for helping beat back this threat to our social well being and values.

Best Wishes

Lou

KAISER PERMANENTE®

Kaiser Permanente Medical Center

November 7, 2003

The Honorable Gale Norton
Secretary of the Interior

Dear Ms. Norton:

I am writing out of concern about the issue of Indian Gambling Casinos. In Sonoma County a gaming casino has already been built in the Alexander Valley. Two more are in the planning stages, one in Cloverdale and another in Rohnert Park.

The Alexander Valley Casino has been a real eye-opener for me. Inadequate roads for fire and police, lies about the size and purpose of building into the hillside, plans to grossly expand without environmental protection, water or other studies.

You need only think for a moment to realize where this COULD lead. Large money sources from Las Vegas or other questionable sources fund Indian groups who buy land, build casinos and proceed not to follow any of the requirements that everyone else has who wants to build on their land. With the amount of money that is available from these sources, where would it end?

As a person and as a physician I oppose gambling and wish it had never come to California. As a member of this community, I believe that gambling casinos should be made to follow all the development rules and regulations that apply to everyone else. Until this happens, I encourage you to refuse to grant the land transfer to continue to build more casinos.

Sincerely,

Susan Ruffner-Statzer, MD

401 Bicentennial Way
Santa Rosa, California 95403-2192
(707) 571-4000

JAMES MARCO STEELE, M.D.
Respiratory Care Center
1221 Farmers Lane, Suite 500 · Santa Rosa, CA 95405
(707) 525-3786 FAX: (707) 525-3791

October 31, 2003

Dear Honorable Gail Norton:

I am writing this letter to tell you of my opposition to the proposed large casino and entertainment center which is being proposed to be built in Rohnert Park. At this time, we have a beautiful area to live in which is economically diverse and in my opinion, there is no need to add this type of large business in our area. In reading about this proposed venture, it seems more of a scam backed by big business gambling and its interests and fronted by local American Indians who have little or no ties to each other, other than their interest in making themselves wealthy at any expense. I would ask you to please use whatever influence you can to stop this venture which I think will diminish the quality of life for all of us here in Sonoma County.

I am a local physician based in Santa Rosa.

Thank you very much for reviewing this letter.

Sincerely,

James Marco Steele, M.D.

JMS:lp

Peter Sultana, M.D.

Family Medicine and Health Promotion
6010 Commerce Boulevard #152
Rohnert Park, CA 94928
(707) 586-5555
Fax (707)586-5554

Vice Chairman Daniel Inouye
722 Hart Building
Washington, DC 20510
(202) 224-3934

COPY

Date: Monday, November 10, 2003
RE: Rohert Park Casino

Dear Vice Chairman Inouye:

I would like to register my opposition to the proposed casino in Rohnert Park. In my opinion, the establishment of a casino would bring in some short term income boost to the community, followed by years of physical and moral deterioration impacting most heavily on the impressionable youth who live here.

In my work, I see many patients who are suffering from addictions, and a good number of them have had problems with gambling. As you may know, this insidious illness tragically affects not only the individual suffering from it, but also the family, friends, and community.

Please do all that you can to stop this damaging business from starting here, and let's work on more wholesome businesses to support our community.

Please consider working to move forward the bills H.R. 2656 and S. 1342 in Congress.

Sincerely,

Peter Sultana, MD

copy to: Hon. Lynn Woolsey
Hon. Dianne Feinstein
Hon. Bale Norton

Peter Sultana, M.D.

Family Medicine and Health Promotion
6010 Commerce Boulevard #152
Rohnert Park, CA 94928
(707) 586-5555
Fax (707)586-5554

The Honorable Gale Norton
Secretary of the Interior

Date: Wednesday, October 29, 2003
RE: Rohert Park Casino

Dear Secretary Norton:

I would like to register my opposition to the proposed casino in Rohnert Park. In my opinion, the establishment of a casino would bring in some short term income boost to the community, followed by years of physical and moral deterioration impacting most heavily on the impressionable youth who live here.

In my work, I see many patients who are suffering from addictions, and a good number of them have had problems with gambling. As you may know, this insidious illness tragically affects not only the individual suffering from it, but also the family, friends, and community.

Please do all that you can to stop this damaging business from starting here, and let's work on more wholesome businesses to support our community.

Sincerely,

Peter Sultana, MD

Peter Sultana, M.D.

Family Medicine and Health Promotion
6010 Commerce Boulevard #152
Rohnert Park, CA 94928
(707) 586-5555
Fax (707)586-5554

Chairman Ben Nighthorse Campbell
380 Russell Building
Washington, DC 20510
(202) 224-5852

COPY

Date: Monday, November 10, 2003
RE: Rohert Park Casino

Dear Chairman Campbell:

I would like to register my opposition to the proposed casino in Rohnert Park. In my opinion, the establishment of a casino would bring in some short term income boost to the community, followed by years of physical and moral deterioration impacting most heavily on the impressionable youth who live here.

In my work, I see many patients who are suffering from addictions, and a good number of them have had problems with gambling. As you may know, this insidious illness tragically affects not only the individual suffering from it, but also the family, friends, and community.

Please do all that you can to stop this damaging business from starting here, and let's work on more wholesome businesses to support our community.

Please consider working to move forward the bills H.R. 2656 and S. 1342 in Congress.

Sincerely,

Peter Sultana, MD

cc: Lynn Woolsey, Congress
Sen. Diane Feinstein
Hon Gale Norton

Peter Sultana, M.D.

Family Medicine and Health Promotion
6010 Commerce Boulevard #152
Rohnert Park, CA 94928
(707) 586-5555
Fax (707)586-5554

Chairman Richard Pombo
2411 Rayburn Building
Washington, DC 20515
(202) 225-1947

COPY

Date: Monday, November 10, 2003
RE: Rohert Park Casino

Dear Chairman Pombo:

I would like to register my opposition to the proposed casino in Rohnert Park. In my opinion, the establishment of a casino would bring in some short term income boost to the community, followed by years of physical and moral deterioration impacting most heavily on the impressionable youth who live here.

In my work, I see many patients who are suffering from addictions, and a good number of them have had problems with gambling. As you may know, this insidious illness tragically affects not only the individual suffering from it, but also the family, friends, and community.

Please do all that you can to stop this damaging business from starting here, and let's work on more wholesome businesses to support our community.

Please consider working to move forward the bills H.R. 2656 and S. 1342 in Congress.

Sincerely,

Peter Sultana, MD

cc: Hons. Lynn Woolsey
Dianne Feinstein
Gale Norton

SANTA ROSA SURGICAL ASSOCIATES

A MEDICAL CORPORATION

WILLIAM F. CRESS, M.D. • BRIAN F. SCHMIDT, M.D. • WALTER W. TOM, M.D. • ALLEN W. CORTEZ, M.D. • ABDUL K. HARRIS, M.D.

October 31, 2003

Governor Arnold Schwarzenegger
State Capital Building
Sacramento, CA 95814

Dear Governor Schwarzenegger:

As you are probably well aware, there is a proposed large casino and entertainment center to be potentially developed in Rohnert Park, California. This would be placed in an area which houses a significant part of the residential community of Sonoma County.

As a long-standing surgeon here in the Sonoma County area, I believe that this casino would have a negative impact on the quality of life for the residents of Sonoma County. Although there would be potential generation of funds from the casino, I believe that the negative impact on the community would make it intolerable. One just needs to look at other areas such as Reno, Nevada to see the type of bad element that is brought into the surrounding residential community. I am not quite sure I understand how being a sovereign nation allows someone to buy other land and then to claim it as a sovereign nation region and then to proceed to place a casino in that area. Nonetheless, this is politics and law, which I have to defer to you.

Please let it be known, however, as a member of this community who has contributed to its medical care and have watched my children grow in this area, that I believe it would be a major mistake to allow this casino to come to fruition. I implore that you do not allow this development to occur.

Sincerely,

Walter W. Tom, MD

WWT/sc
cc: Honorable Lynn Woolsey, United States Representative
Honorable Diane Feinstein, United States Senator
Honorable Gale Norton, United States Department of the Interior
Kenneth Lamb, MD, FCCP

3536 MENDOCINO AVE., STE. 250 • SANTA ROSA, CALIFORNIA 95403 • TELEPHONE (707) 579-2100 • FACSIMILE (707) 523-061

Carl Wilson, M.D.
Jill Edison, M.D.

435 DOYLE PARK DRIVE
SANTA ROSA, CALIFORNIA 95405

TELEPHONE (707) 527-9510 • FAX (707) 527-1306

425-C SOUTH ORCHARD ST.
UKIAH, CALIFORNIA 95482

November 5, 2003

The Honorable Gail Norton
Secretary of Interior

Honorable Representative:

I am writing this letter on behalf of the "physicians and nurses against the casino". I believe the recent proliferation of gambling casinos in the North Coast area have lent themselves to a potential future problem with the quality of life as well as the imposition of this form of entertainment on our local community. I fully understand and am aware of the financial consequences and the enhanced revenue that may be attainable which will facilitate some of our local improvements but at the expense of the nature and quality of life and recreation here in the North Coast.

I believe that the quality of the job delivered by these gambling facilities is not consistent with a balanced emotional, psychological and moral work force.

I strongly encourage you to vote negatively on any further expansion of gambling, especially in the recent proposed Rohnert Park area.

Thank Respectfully,

Carl Wilson, M.D.
CW/jg

ima
INTERNAL MEDICINE ASSOCIATES

NICHOLAS ANTON, M.D., F.A.C.P.
GEORGE BISBEE, M.D.
ROBERT SCHAEFER, M.D.
BRUCE TUCKER, M.D.
CATHERINE DAVIS, M.D.
JACQUELINE SKVARIL, M.D.

500 DOYLE PARK DRIVE, #G03
SANTA ROSA, CA 95405
PHONE 707.544.3411
FAX 707.544.0834

Dear Secretary Norton,

I wish to voice my oppisition to an indian casino being established in Rohnert Park, California. The harm to the community and environment should not be accepted for our financial benefit. The cultural injury to our children and the inevitable health hazards are overwhelming. It is important to do "the right thing," not the easiest.

Please, as a representative for me, do not allow this to proceed.

Respectfully,

Bruce N. Tucker, M.D.

SONOMA - MARIN
ADVANCED EYECARE

Robert A. Yohai, M.D., P.C.

Certified, Am. Board of Ophthalmology
Ophthalmic Plastic Surgery
Comprehensive Eye Care
Cataract/IOL Surgery

October 31, 2003

The Honorable Gale Norton
Secretary of the Interior

Dear Secretary Norton,

Please oppose the land transfer and compact agreement that would allow construction of a casino in Rohnert Park by the Federated Indians of Graton Rancheria.

The construction of this casino in Rohnert Park would have a detrimental effect on the children, families, and college students in this fair city. Please oppose it.

Sincerely,

Robert A Yohai

Robert A. Yohai, MD

Protecting Your Vision - For Life

864 Second Street • Santa Rosa, CA 95404 • 707-544-7044 • Fax 707-544-1051 • www.great-eyes.com
165 Rowland Way • Suite 104 • Novato, CA 94945 • 415-878-0222

MARCH 22 2004

713

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NATIONAL INDIAN
GAMING COMMISSION
2004 MAR 26 PM 4: 16

DEIS Scoping Comments, Graton Rancheria Casino Project

Attention: Christine Nagle NEPA Coordinator

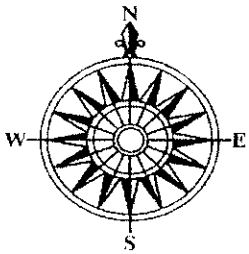
First of all we would like to list the concerns that we have in building this project at this location outside of Rohnert Park.

1. FAMILY CITY It is great concern to us, as this is a family city and we would greatly be concerned with our children and college age kids. It would be in walking distance of our City.
2. WATER If this project were built it would be taking water that is very short in this community. The wells that they would be building would be taking away the water that all the farmers are relying on. The farmers would have to dig their wells deeper. This would cost more money for them.
3. ENDANGERED SPECIES There are different endangered species at this site. One being the tiger salamander.
4. TRAFFIC Our roads are already crowded now, and we can't handle any more traffic. The roads were they want to put the entrance of the Casino is narrow and our county can't afford to build the road to carry the many cars that would be coming to the Casino. The roads around this area always flood. The Federated Indians of Graton Rancheria said they would pay part to repair it. WHO IS GOING TO FINISHE THE PROJECT/
5. FLOODING The flooding is terrible in that part of Rohert Park. The roads get closed when we have a bad rainstorm. Where is the water going to go after the pavement is put down? The soil around here is adobe soil.
6. CRIME ETC.The crime is bad now; this Casino will bring in more crime. Drugs, Prostitution, robbery, Money problems. Why do we have to have Graton Rancheria pay more for policeman. Are we going to have more trouble after the Casino comes? OF COURSE WE ARE. Also when the crime goes outside of the Casino our policeman have to take care of it.
7. COUNTY SEPARATOR This parcel of land is in the County separator, surrounded by homes with wells. It is in the Laguna de Santa Rosa. This is a terrible place to put a Casino.

Thank you,

Evelyn + Roy Schnecklotl
6365 San Benito DR
Rohnert Park CA 94928
707-588.9359

714



SCTA Sonoma County Transportation Authority

Keeping Sonoma County Moving

RECEIVED
NATIONAL INDIAN GAMING COMMISSION
2004 MAR 26 PM 4: 16

Directors

Paul Kelley, Chair
Sonoma County

Robert Jehn, V. Chair
Cloverdale

Steve Allen
Windsor

Bob Blanchard
Santa Rosa

Joe Costello
Sonoma

Patricia Gilardi
Cotati

Mike Healy
Petaluma

Linda Kelley
Sebastopol

Mike Kerns
Sonoma County

Lisa Schaffner
Healdsburg

Tim Smith
Sonoma

Vicki Vidak-Martinez
Rohnert Park

SCTA Staff

Suzanne Wilford
Executive Director

Patrice Siefers
Deputy Director of
Projects & Programming

Janet Spilman
Sr. Transportation Planner

Elijah Henley
Sr. Transportation Planner

Marge Franco
Executive Assistant

520 Mendocino Avenue
Suite 240
Santa Rosa, CA 95401
PH: 707-565-5373
FAX: 707-565-5370

March 23, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, D.C. 20005

RE: DEIS Scoping Comments Graton Rancheria Casino Project

The Sonoma County Transportation Authority is requesting that the transportation, traffic, air quality and land use planning issues listed below be addressed in the Environmental Impact Study for the Federated Indians of Graton Rancheria's proposed casino and hotel resort. For each issue evaluated, we ask that the current baseline data be provided, along with the anticipated impacts.

1. Evaluate the increased traffic that will result from the project. Consider the year 2030 for cumulative impacts (both with and without the project), and include the projected growth.

2. Evaluate effects on Highway 101 corridor, the exits and entrances to Highway 101 and the likely routes to the project site from throughout the region. Identify the capacity of the planned improvements to Highway 101, including impacts from planned development along the corridor, current trip patterns and population growth, and determine how much additional capacity will be needed to accommodate the project. Include both level of service and queuing performance measures.

3. Evaluate existing conditions of streets and roads (including small rural roads) in the area and identify impacts of the project. If improvements to local streets and roads are proposed to accommodate the project, identify the impacts of these proposed improvements per NEPA and CEQA.

4. Evaluate the potential change to the level of service on local streets and roads and the queuing that will result during peak hours on weekdays and weekends with particular attention to the following major arterials and interchanges:

   - Wilfred Avenue & Wilfred Avenue Interchange at Hwy 101
   - Rohnert Park Exprwy. & Rohnert Park Exprwy. Interchange at Hwy 101
   - Todd Road Interchange at Hwy 101
   - Highway 116 & Highway 116 Interchange at Hwy 101
   - Bellevue Interchange at Hwy 101 (proposed) and Farmers Lane extension

- Stony Point Road
- Adobe Road
- Petaluma Hill Road
- Old Redwood Highway
- Lakeville Road
- Llano Road
- Highway 121
- Route 37
- Commerce Boulevard
- Golf Course Drive
- Santa Rosa Avenue

5. Evaluate the impacts of special event traffic including weekend and evening peak hours for the casino and hotel complex. Evaluate the cumulative impacts given other event venues in the area such as the Green Music Center, Sonoma State University and the proposed sports complex.

6. For any traffic evaluations, we request that the consultant use the recently updated countywide traffic model used for the General Plan 2020 to project future cumulative traffic with and without the casino and hotel project.

7. Evaluate transit and para-transit needs for the project both in terms of operating cost and attendant capital costs. Will shuttle services be provided? If so, identify likely routes and types of vehicles. What off site parking will be provided?

8. Identify how transit access will be provided as part of the property.

9. How will bike and pedestrian safety be addressed in and around the property?

10. Evaluate a possible transit station (bus and rail) on the west side of Hwy 101 as well as needed services other than the base schedule proposed by SMART and the existing transit schedules operated by Sonoma County Transit.

11. Evaluate traffic safety issues related to the project including access to private property in the area of the project.

12. Identify number and type of parking facilities that will be included in the project including number of parking spaces, height of structures, type of vehicles accommodated and where transit vehicles will be accommodated.

13. Evaluate the emissions of criteria pollutants from the expected casino traffic and construction activities and compare to BAAQMD thresholds. Include the queuing analysis and LOS for purposes of this evaluation.

14. Evaluate cumulative traffic emissions and how they will impact regional air quality conformity.

15. Evaluate potential conflicts with the Countywide Transportation Plan and the Regional Transportation Plan. Particular attention should be paid to the potential secondary growth

inducing effects of providing new or expanded roadway access to the casino on rural lands in the vicinity of the project.

16. Identify ancillary activities related to the project that could potentially conflict with Countywide Transportation Plan and the Regional Transportation Plan.

17. Identify funding for improvements needed to the road, highway and transit system due to the project. Identify the fair share of payment from the projects for these improvements.

On items related to the State highway system all assumptions, traffic and trip factors, turning movements and other traffic impact data must be consistent with that used by Caltrans. There should be no assumed "pass-by" trips. The analysis of highway impacts should use only methods contained in the Caltrans traffic manuals and as directed by Caltrans District 4. Current traffic, forecast traffic, growth factors, and turning movements shall be derived from the latest figures available from Caltrans or under Caltrans guidance.

Finally, the SCTA requests a detailed site plan showing all proposed structures and improvements be made available as soon as possible. Any off-site improvements should also be identified including off-site parking.

Thank you for your consideration.

Sincerely,

Paul Kelley

Paul Kelley
Chair, SCTA

715 Nigson 10th 2004

1536 Gladstone Way ,
Rohnert Park CA 94928

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

"DEIS Scoping Comments, Graton Rancheria Casino Project"

To the Hearing Officer,

I would like to request that the DEIS thoroughly address not only the "No Action" alternative but also the 48 alternative sites referenced by the Federated Indians and their partners as they appeared in front of our city council in August 2003 .

These alternative sites were in the US 101 corridor , both in Marin and Sonoma Counties . The map showing these various sites was never made available to this councilmember but no doubt it can be found and made available to NIGC.

As consideration is given to the now 460acre site to the West of Rohnert Park, traffic conditions at the Wilfred Avenue Overcrossing project currently under environmental review must be readdressed since current modeling efforts do not include casino resort development on Wilfred Avenue itself.

Finally, I submit, for the record, a letter from the Mayors of 6 of the 9 local Sonoma County jurisdictions potentially affected by this project. They may well have other comments relevant to this process but , in the meantime, their desire for full mitigation of impacts on their communities is clearly expressed.

Submitted for the record on Wednesday 10th March 2004,

Jake Mackenzie, Councilmember , City of Rohnert Park.

Attachment -20pages

CLOVERDALE
COTATI
HEALDSBURG
PETALUMA
ROHNERT PARK
SANTA ROSA
SEBASTOPOL
SONOMA
WINDSOR

MAYORS' AND COUNCILMEMBERS' ASSOCIATION OF SONOMA COUNTY

Chair City for 2003 - Town of Windsor
Mayor Steve Scott
P.O. Box 100
Windsor, CA 95492-0100
(707) 838-5311

November 18, 2003

Fax: 202-456-7044

Honorable George W. Bush
President of the United States
c/o Andrew Card, Jr., Chief of Staff
1600 Pennsylvania Avenue
Washington, DC 20500

Dear President Bush:

The undersigned mayors from the cities of Healdsburg, Petaluma, Santa Rosa, Sebastopol, Sonoma and Windsor in Sonoma County, California, wish to express their concerns regarding Indian gaming as it may affect our communities. The attached resolutions support the concept that local jurisdictions have meaningful input into the development of tribal casino proposals and that proper and adequate mitigation of off-reservation impacts be implemented. Although we understand that recognized Native American tribes have tribal sovereignty, as Mayors of our respective communities, we also recognize the need for cities and counties to protect their local physical and social environments from the impact of large-scale development that often comes with Indian gaming.

Your consideration of our concerns will be greatly appreciated.

Sincerely,

Leah Gold, Mayor, City of Healdsburg

David Glass, Mayor, City of Petaluma

Sharon Wright, Mayor, City of Santa Rosa

Craig Litwin, Mayor, City of Sebastopol

Dick Ashford, Mayor, City of Sonoma

Steve Scott, Mayor, Town of Windsor

CITY OF HEALDSBURG

RESOLUTION NO. 117-2003

A RESOLUTION OF CITY COUNCIL OF THE CITY OF HEALDSBURG SUPPORTING REVISIONS [HR 2656/S1342] IN FEDERAL LEGISLATIVE REQUIREMENTS RELATED TO GAMING PROPOSALS OR OTHER MAJOR TRIBAL ENTERPRISES

WHEREAS, the Healdsburg City Council respects the rights of Native Americans to establish and have recognized tribal sovereignty, and to secure lands under their jurisdiction; and

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or other major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and

WHEREAS, developments of great magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater, energy systems and resources, affordable housing and emergency services, both built and yet to be built; and

WHEREAS, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure with a substantial burden likely falling upon existing and future taxpayers, residents, visitors and businesses; and

WHEREAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize off-reservation environmental resources for intense development without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, approximately 360 acres of prime agricultural lands west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development - including an extensive gaming complex, with a 300-room hotel, spas, restaurants, a 2000-seat entertainment venue, parking and other support services, by Station Casinos, a Las Vegas-based developer and the Federated Indians of the Graton Rancheria (Graton Tribe); and

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa Plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally identified endangered species; and

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impacts that are then mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine whether the use of this land sought for gaming will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe; and

WHEREAS, the restoration of the Graton Tribe in 2000 was predicated, in part, on its promise not to engage in casino gaming,

NOW, THEREFORE, BE IT RESOLVED that the Healdsburg City Council strongly supports the revisions in federal legislation [HR 2656/ S1342] introduced by Rep. Woolsey and Senator Feinstein. The Healdsburg City Council also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage; and

BE IT FURTHER RESOLVED that the Healdsburg City Council supports the California State Association of Counties policy document regarding compact negotiations for Indian Gaming, and requests that the Graton Tribe follow the principles contained therein;

BE IT FURTHER RESOLVED that the Healdsburg City Council strongly opposes the creation of a gambling casino resort on any site that is inconsistent with the local land use planning and zoning policies.

BE IT FURTHER RESOLVED that the Healdsburg City Council calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1. The proposed casino / resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation; and

2. The proposed casino/resort project must be subject to the principles of the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and

3. Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not bear the costs associated with the impacts of the casino / resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project; and

4. In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take NO OTHER LAND anywhere in Sonoma County or in any adjacent county into tribal trust NOW OR IN THE FUTURE.

5. The proposed casino/resort project must be subject, at a minimum, to the same level of public safety review and enforcement as would a private developer.

PASSED, APPROVED AND ADOPTED this 20th day of October, 2003 by the following vote:

AYES:	Councilmembers: (5)	Gleason, Liles, Mitchell, Schaffner and Mayor Gold
NOES:	Councilmembers: (0)	None
ABSENT:	Councilmembers: (0)	None
ABSTAINING:	Councilmembers: (0)	None

SO ORDERED:

/S/ LEAH GOLD
Leah Gold, Mayor

ATTEST:

/S/ MARIA CURIEL
Maria Curiel, City Clerk

I, MARIA CURIEL, City Clerk of the City of Healdsburg, do hereby certify that the foregoing is a full, true, and correct copy of a resolution adopted by the City Council of the City of Healdsburg on the 20th day of October, 2003.

City Clerk

Resolution No. 2003-219 N.C.S.
of the City of Petaluma, California

RESOLUTION OF THE PETALUMA CITY COUNCIL SUPPORTING MAYORS' & COUNCILMEMBERS' ASSOCIATION LETTER TO FEDERAL REPRESENTATIVES REGARDING INDIAN GAMING

WHEREAS, the Sonoma County Mayors, at their executive meeting on October 9, 2003, agreed to agendize for consideration of the general membership a letter to federal legislators regarding Indian gaming; and,

WHEREAS, while recognizing that American tribes have tribal sovereignty, there is also recognized the need for cities and counties to protect their local physical and social environments from the impact of large-scale development that often comes with Indian gaming.

NOW, THEREFORE, BE IT RESOLVED that the Petaluma City Council supports the Mayors' & Councilmembers' Association proposed letter to federal legislators regarding Indian gaming.

Under the power and authority conferred upon this Council by the Charter of said City.

REFERENCE:

I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a (Regular) (Adjourned) (Special) meeting on the 3rd day of November, 2003, by the following vote:

Approved as to form

City Attorney

AYES: Canevaro, Mayor Glass, Harris, Healy, Moynihan, Vice Mayor O'Brien, Torliatt

NOES: None

ABSENT: None

ATTEST: Gayle Peterson
City Clerk

David A. Glass
Mayor

Council File
Res. No. 2003-219 N.C.S.

Resolution No. 2003-220 N.C.S.
of the City of Petaluma, California

A RESOLUTION OF THE PETALUMA CITY COUNCIL SUPPORTING REVISIONS [HR 2656/S1342] IN FEDERAL LEGISLATIVE REQUIREMENTS RELATED TO GAMING PROPOSALS AND ASSOCIATED MAJOR TRIBAL ENTERPRISES PROPOSED BY THE FEDERATED INDIANS OF THE GRATON RANCHERIA

WHEREAS, the Petaluma City Council respects the rights of Native Americans to establish and have recognized tribal sovereignty, and to secure lands under their jurisdiction; and,

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or associated major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and,

WHEREAS, developments of great magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater and energy systems and resources, affordable housing, and emergency services, both built and yet to be built; and,

WHEREAS, without appropriate mitigation, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure with a substantial burden falling upon existing and future taxpayers, residents, visitors and businesses; and,

WHEREAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and,

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and,

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize prized off-reservation environmental resources for intense development without regard to locally approved general plans or any meaningful environmental review or protection; and,

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal

casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and,

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and,

WHEREAS, approximately 360 acres of prime agricultural lands west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development - including an extensive gaming complex, with a 300 room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services, by Station Casinos, a Las Vegas-based developer and the Federated Indians of the Graton Rancheria (Graton Tribe); and,

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa Plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and,

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally endangered species; and,

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impacts then to be mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine if the use of this land, sought for gaming, will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe; and,

WHEREAS, the Graton Tribe was restored in 2000 based, in part, on its promise not to engage in Indian casino gaming.

NOW, THEREFORE, BE IT RESOLVED that the Petaluma City Council strongly supports the revisions in federal legislation [HR 2656/S1342] introduced by Representative Woolsey and Senator Feinstein. The Petaluma City Council also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage.

BE IT FURTHER RESOLVED that the Petaluma City Council supports the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and requests that the Graton Tribe follow the principles contained therein.

BE IT FURTHER RESOLVED that the Petaluma City Council, based on the information currently available, strongly opposes the creation of a gambling casino resort on any site that is inconsistent with the local land use planning and zoning policies.

BE IT FURTHER RESOLVED that the Petaluma City Council calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1. The proposed casino/resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation; and

2. The proposed casino/resort project must be subject to the principles of the California state Association of Counties policy document regarding compact negotiations for Indian Gaming; and

3. Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not bear the costs associated with the impacts of the casino/resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project; and

4. In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take NO OTHER LAND anywhere in Sonoma County or in any adjacent county into tribal trust NOW OR IN THE FUTURE.

5. The proposed casino/resort project must be subject, at a minimum, to the same level of public safety review and enforcement as would a private developer.

Under the power and authority conferred upon this Council by the Charter of said City.

REFERENCE: **I hereby certify the foregoing Resolution was introduced and adopted by the Council of the City of Petaluma at a (Regular) (Adjourned) (Special) meeting on the 3rd day of November, 2003, by the following vote:**

Approved as to form

.....
City Attorney

AYES: Canevaro, Mayor Glass, Harris, Healy, Moynihan, Vice Mayor O'Brien, Torliatt

NOES: None

ABSENT: None

ATTEST: Gayle Peterson
City Clerk

David Glass
Mayor

Council File Res. No. 2003-220 N.C.S.

RESOLUTION NO. 25807

RESOLUTION OF THE COUNCIL OF THE CITY OF SANTA ROSA SUPPORTING REVISIONS [HR 2656/S1342] IN FEDERAL LEGISLATIVE REQUIREMENTS RELATED TO GAMING PROPOSALS OR OTHER MAJOR TRIBAL ENTERPRISES

WHEREAS, the Santa Rosa City Council, respects the rights of Native Americans to establish and have recognized tribal sovereignty, and to secure lands under their jurisdiction; and

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or other major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and

WHEREAS, developments of large magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater, energy systems and resources, affordable housing and emergency services, both built and yet to be built; and

WHEREAS, without appropriate mitigation, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure with a substantial burden likely falling upon existing and future taxpayers, residents, visitors and businesses; and

WHEREAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize off-reservation environmental resources for intense development without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, approximately 360 acres of prime agricultural lands west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development - including an extensive gaming complex, with a 300 room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services by Station Casinos, a Las Vegas-based developer and the Federated Indians of the Graton Rancheria (Graton Tribe); and

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally identified endangered species; and

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impacts that are then mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine if the use of this land sought for gaming, will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe.

NOW, THEREFORE, BE IT RESOLVED that the Council of the City of Santa Rosa strongly supports the revisions in federal legislation [HR 2656/ S1342] introduced by Representative Woolsey and Senator Feinstein. The Council of the City of Santa Rosa also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage.

BE IT FURTHER RESOLVED that the Council of the City of Santa Rosa supports the California State Association of Counties policy document regarding compact negotiations for Indian Gaming, and requests the Graton Tribe follow the principles contained therein.

BE IT FURTHER RESOLVED that the Council of the City of Santa Rosa, based on the information currently available, strongly opposes the creation of a gambling casino resort on any site that is inconsistent with the local land use planning and zoning policies.

BE IT FURTHER RESOLVED that the Council of the City of Santa Rosa calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1. The proposed casino/resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation;

2. The proposed casino/resort project must be subject to the principles of the California State Association of Counties policy document regarding compact negotiations for Indian Gaming;

3. Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not beat the costs associated with the impacts of the casino/resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project using a NEPA and CEQA process with mitigation measures for all identified impacts; and

4. In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take no other land anywhere in Sonoma County or in any

adjacent county into tribal trust now or in the future.

IN COUNCIL DULY PASSED this 4th day of November, 2003.

AYES: (7) Mayor Wright; Councilmember Bender, Blanchard, Condron, Evans, Martini, Rabinowitsh

NOES: (0)

ABSENT: (0)

ABSTAIN: (0)

ATTEST: _____
City Clerk

APPROVED: _____
Mayor

APPROVED AS TO FORM:

_____
City Attorney

RESOLUTION NO. 5348

A RESOLUTION OF THE SEBASTOPOL CITY COUNCIL SUPPORTING HR 2656/S1342 AND PROPOSING ACTIONS TO PROTECT SONOMA COMMUNITIES FROM REGIONAL IMPACTS RESULTING FROM GAMING AND TRIBAL ENTERPRISES PROPOSED BY THE FEDERATED INDIANS OF THE GRATON RANCHERIA.

WHEREAS, The Sebastopol City Council, respect the rights of Native Americans to establish and have recognized tribal sovereignty, and to secure lands under their jurisdiction; and

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or associated major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and

WHEREAS, developments of great magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater and energy systems and resources, and emergency services, both built and yet to be built; and

WHEREAS, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure with a substantial burden falling upon existing and future taxpayers, residents, visitors and businesses; and

WHEREAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize prized off-reservation environmental resources for intense development without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have been granted no effective input into the development of proposed tribal casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, approximately 360 acres of prime agricultural lands just west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development - including an extensive gaming complex, with a 300

room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services, by Station Casinos, a Las Vegas-based developer and the Federated Indians of the Graton Rancheria (Graton Tribe); and

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa Plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally endangered species; and

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impact then to be mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine if the use of this land, sought for gaming, will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe; and

WHEREAS, the Graton Tribe was restored in 2000 based, in part, on its promise not to engage in Indian casino gaming,

NOW, THEREFORE, BE IT RESOLVED that the Sebastopol City Council strongly supports the revisions in federal legislation [HR 2656/ S1342] introduced by Rep.Woolsey and Senator Feinstein. The Sebastopol City Council also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage; and

BE IT FURTHER RESOLVED that the Sebastopol City Council support the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and

BE IT FURTHER RESOLVED that the Sebastopol City Council, based on the information currently available, strongly opposes the creation of a gambling casino resort on any site that is inconsistent with the local land use planning and zoning policies.

BE IT FURTHER RESOLVED that the Sebastopol City Council calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1) The proposed casino / resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation; and
2) The proposed casino/resort project must be subject to the principles of the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and
3) Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not bear the costs associated with

the impacts of the casino / resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project using a NEPA and CEQA process with mitigation measures for all identified impacts; and

4) In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take NO OTHER LAND anywhere in Sonoma County or in any adjacent county into tribal trust NOW OR IN THE FUTURE.

PASSED, APPROVED AND ADOPTED this 21 day of October 2003 by the following vote:

AYES: Councilmembers Anderson, Kelley, Robinson, Spooner and Mayor Litwin
NOES: None
ABSTAIN: None
ABSENT: None

MAYOR

ATTEST:
CLERK

CITY OF SONOMA

RESOLUTION NO. 46 - 2003

A RESOLUTION OF THE SONOMA CITY COUNCIL SUPPORTING REVISIONS [HR 2656/S1342] IN FEDERAL LEGISLATIVE REQUIREMENTS RELATED TO GAMING PROPOSALS AND ASSOCIATED MAJOR TRIBAL ENTERPRISES PROPOSED BY THE FEDERATED INDIANS OF THE GRATON RANCHERIA

WHEREAS, we, the members of the Sonoma City Council, respect the rights of Native Americans to establish and have recognized tribal sovereignty, and to secure lands under their jurisdiction; and

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or associated major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and

WHEREAS, developments of great magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater and energy systems and resources, and emergency services, both built and yet to be built; and

WHEREAS, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure with a substantial burden falling upon existing and future taxpayers, residents, visitors and businesses; and

WHEREAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize prized off-reservation environmental resources for intense development without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have been granted no effective input into the development of proposed tribal casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, approximately 360 acres of prime agricultural lands just west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development - including an extensive gaming complex, with a 300 room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services, by Station Casinos, a Las Vegas-based developer and the Federated Indians of the Graton Rancheria (Graton Tribe); and

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa Plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally endangered species; and

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impact then to be mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine if the use of this land, sought for gaming, will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe; and

WHEREAS, the Graton Tribe was restored in 2000 based, in part, on its promise not to engage in Indian casino gaming.

NOW, THEREFORE, BE IT RESOLVED that the Sonoma City Council strongly supports the revisions in federal legislation [HR 2656/ S1342] introduced by Rep.Woolsey and Senator Feinstein. The Sonoma City Council also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage; and

BE IT FURTHER RESOLVED that the Sonoma City Council support the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and

BE IT FURTHER RESOLVED that the Sonoma City Council calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1) The proposed casino / resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation;
2) Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not bear the costs associated with the impacts of the casino / resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project; and
3) In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take NO OTHER LAND anywhere in Sonoma County or in any adjacent county into tribal trust NOW OR IN THE FUTURE.

PASSED, APPROVED AND ADOPTED this 15TH day of October 2003 by the following vote:

AYES: Barnett, McKesson, Costello, Brown, Ashford
NOES: None
ABSENT: None

Dick Ashford

Dick Ashford, Mayor

ATTEST:

Gay Rainsbarger

Gay Rainsbarger, City Clerk

RESOLUTION NO. 1446-03

A RESOLUTION OF THE TOWN COUNCIL OF THE OF THE TOWN OF WINDSOR SUPPORTING REVISIONS [HR 2656/S1342] IN FEDERAL LEGISLATIVE REQUIREMENTS RELATED TO GAMING PROPOSALS AND ASSOCIATED MAJOR TRIBAL ENTERPRISES PROPOSED BY THE FEDERATED INDIANS OF THE GRATON RANCHERIA

WHEREAS, the members of the Town of Windsor Town Council, respect the rights of Native Americans to establish and have recognized tribal sovereignty, as granted by the federal government, and to secure lands under their jurisdiction; and

WHEREAS, under the existing federal legislative requirements, there is no provision for coordination of gaming proposals or associated major tribal enterprises with established and approved off-reservation local or regional planning law and General Plans in any timely and meaningful way; and

WHEREAS, developments of great magnitude are being proposed which are dependent upon local and regional public infrastructure, including highways, streets, transit systems, water, wastewater and energy systems and resources, affordable housing, and emergency services, both built and yet to be built; and

WHEREAS, without appropriate mitigation, the developments proposed are very likely to have substantial negative impacts and place substantial burdens on the public infrastructure, with a substantial burden falling upon existing and future taxpayers, residents, visitors and businesses; and

WHERESAS, with the rapid construction of tribal gaming facilities, local governments are experiencing serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, the current conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the laudable goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow Nevada developers to seize prized off-reservation environmental resources for intense development without regard to locally approved General Plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal

casinos that threaten their rights and the State appears to have no effective redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties has adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project.

WHEREAS, approximately 360 acres of prime agricultural lands west of Rohnert Park are presently in imminent danger of being withdrawn from County land use control and placed into trust for the purposes of casino development, including an extensive gaming complex with a 300-room hotel, spas, restaurants, a 2000-seat entertainment venue, parking and other support services by Station Casinos, a Las Vegas-based developer, and the Federated Indians of the Graton Rancheria (Graton Tribe); and

WHEREAS, Station Casino and the Graton Tribe's gaming proposal will have substantial negative impacts upon the federal highway system (US Highway 101), upon which it is dependent for bringing its customers into and out of the region; on local and regional roads; to the Santa Rosa Plain groundwater aquifer, to water quality, along with unknown local and regional fiscal impacts; and

WHEREAS, the proposed Graton Tribe casino site is proposed on property whose zoning is inconsistent with the Sonoma County General Plan (on prime agricultural land, in the community separators and outside Rohnert Park's Urban Growth Boundary), within the Laguna de Santa Rosa's flood plain and within critical wetland habitat for several federally endangered species; and

WHEREAS, the proposed Graton Tribe casino proposal is not subject to a thorough CEQA-like process that identifies fiscal and environmental impact then to be mitigated by the Graton Tribe, nor is administrative consideration by the Department of the Interior required to determine if = the use of this land, sought for gaming, will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the tribe; and

WHEREAS, the Graton Tribe was restored in 2000 based, in part, on its promise not to engage in Indian casino gaming,

NOW, THEREFORE, BE IT RESOLVED that the Town Council of the Town of Windsor strongly supports the revisions in federal legislation [HR 2656/ S1342] introduced by Representative Woolsey and Senator Feinstein. The Town Council also urges all members of the Senate and House of Representatives to support these important statutory changes and immediately move for their passage.

BE IT FURTHER RESOLVED that the Town Council supports the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and

BE IT FURTHER RESOLVED that the Town Council, based on the information currently available, strongly opposes the creation of a gambling casino resort on any site that is inconsistent with the local land use planning and zoning policies.

BE IT FURTHER RESOLVED that the Sonoma City Council calls on the Board of Supervisors of the County of Sonoma, in all negotiations with the Tribe concerning creation of a gambling casino resort, to safeguard the vital and legitimate interests of all Sonoma County citizens by requiring that the following minimum standards be included in a binding, legally-enforceable Memorandum of Understanding with the Tribe:

1) The proposed casino / resort project must be subject, at a minimum, to the same level of environmental review as would be required by the pending federal legislation; and

2) The proposed casino/resort project must be subject to the principles of the California State Association of Counties policy document regarding compact negotiations for Indian Gaming; and

3) Even though the pending federal legislation does not require environmental mitigation, in order to ensure that the citizens of Sonoma County do not bear the costs associated with the impacts of the casino / resort, the Tribe must agree to mitigate, and must in fact mitigate, all environmental impacts caused by its project using a NEPA-type process where identified impacts are mitigated; and

4) In order to prevent Sonoma County cities from having land within their jurisdiction exempted from local land use control by reason of future acquisition by the Graton Tribe, the Tribe must agree that it will take NO OTHER LAND anywhere in Sonoma County or in any adjacent county into tribal trust NOW OR IN THE FUTURE.

PASSED, APPROVED AND ADOPTED this 15th day of October 2003 by the following vote:

AYES:	**COUNCILMEMBERS FUDGE AND MOREHOUSE AND MAYOR SCOTT**
NOES:	**COUNCILMEMBER SALMON**
ABSTAIN:	**NONE**
ABSENT:	**COUNCILMEMBER ALLEN**

MAYOR

ATTEST:

TOWN CLERK

Paul D. Stutrud
P. O. Box 2205
Rohnert Park CA 94927-2205

27 February - 9 March 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington DC 20005

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Re: **DEIS Scoping Comments, Graton Rancheria Casino Project**

Dear Ms. Nagle:

I have been a resident of Rohnert Park for 19 years. I have been very involved in the community, particularly in matters regarding the state-required General Plan and its subsequent Elements, which include: Circulation, Open Space, Housing, Safety, Conservation and Land Use. I have also filed complaints with the Sonoma County Grand Jury regarding complaints about how Rohnert Park does not do things according to the Government Codes and other state laws and policies. Four of those Grand Jury Complaints were investigated and published. I will provide copies of them upon your request.

Regarding the proposal by the Graton Rancheria Indians and Stations Casinos of Las Vegas, Nevada to build a hotel and casino on the particular piece of property that lies east of Stony Point Road and north of the Rohnert Park Expressway, in my educated opinion, is one of the worst sites that could have ever been chosen.

For as long as I have lived in Rohnert Park and I am sure for many previous years, the site at Stony Point Road has been plagued with problems of flooding in the winter time. The road leading to the proposed casino site include: Rohnert Park Expressway, Wilfred Avenue, Todd Road, Stony Point Road. There are no mitigations for the problems of water flooding.

Another problem, that I first learned about when I first moved into Rohnert Park is with the water wells that supply the citizens of Rohnert Park. As early as 1985, I was hearing complaints of "brown" water and "smelly" water from the folks who live in 'G' Section.

> (For your information, the city of Rohnert Park is divided up into section. Each section has its streets named with words that all belong with the same letter. Streets in 'A' Section such as 'Adele', 'Alden' and 'Almquist' or in "C' Section the streets have names beginning with the letter 'C' such as 'Cairo', 'Cornell' and 'Calcutta' and, of course, the streets in 'G' Section all begin with the letter 'G' such as "Gladstone", "Greywhaler", etc.

The wells in 'G' Section were closed down. But there have been reports of 'brown' or 'smelly' water in 'F' and 'H' Sections. Shortly after moving into my home in 'H' Section I had a good example of the brown water problem.

One morning I was going to wash my car. I went into the downstairs bathroom and put a bucket under the bathtub outlet. Dark brown water came out and filled the two gallon bucket. Since I had never lived in a house that used well water I was a little surprised. I figured that maybe the plumbers had left the feeder pipe uncapped before connecting it to the house and some dirt had gotten into the line before it was connected. I connected a hose up to the water heater in the garage and ran it out to the front lawn. I shut the water heater off, shut off the input valve and opened the valve to drain the water heater. When I went back out to the end of the house I noticed course sand coming out of the hose. I ran back in the garage and grabbed a bucket and stuck the hose in the bucket. In the time it took to drain the water heater the bucket was half filled with sand. I took a sample in a jar and the next day went down to the Rohnert Park Public Works department.

I was told that the water in Rohnert Park is not filtered as it comes out of the well, as the reason for the sand. I was told that the brown water was caused by iron oxide and manganese. If I didn't like it, I should install water filters at my house. I did.

I have been changing water filters on my house since 1985. I have also noticed that the frequency of changing seems to be seasonal. In the month of July I have had to change water filters every week because there was so much crud in them. On the other hand, I only have to change filters every two or three months during the winter.

About ten years ago, I really got interested in Rohnert Park's well water problem after being requested to act as a witness and complaintant about the matter of a contaminated soil problem that was about 100 feet from Rohnert Park's Well 15. I atteneded some meetings at the State of California Water Quality Control Agency and was astounded by testimony by the City of Rohnert Park's City Engineer, Roland Brust. In a few words, he said, "I could care less about the proximity of the contamination site."

Mr. Brust was under the impression that the City of Rohnert Park was soon going to be getting all of its water from the Sonoma County Water Agency, which is drawn from the Russian River.

Although the City of Rohnert Park does get some water from the Water Agency it is still using more well water than Water Agency water. The ratio is about 20% from the Agency and 80% from well water. It is not as simple as that though.

Rohnert Park also obtains water from the City of Petaluma via the North Marin Water District. This water is a 14% surplus of Petaluma's water allotment from the Sonoma County Water Agency. With this 14% allotment, the City of Rohnert Park draws 400% of its allotment from the Water Agency.

According to the **Rohnert Park General Plan**, Rohnert Park uses more than **4 million gallons of ground water a day**. Also according to the **Rohnert Park General Plan**, the **recharge rate** for the underlying aquifer is only **1.6 million gallons a day**. In other words, Rohnert Park is drawing out more than double the water than is being replaced. I should also mention that out of this same aquifer, Sonoma State University is drawing water, along with the City of Cotati, the unincorporated area called Canon Manor and a lot of private homes.

According to published information, **the water table level has dropped 150 feet.** It is not recovering.

In fact, a lawsuit was filed and settled in September of 2002 about the excess water use and the false information published in the Environmental Impact Report for the new Rohnert Park General Plan.

Hundreds of wells have gone dry in the area around Rohnert Park. These wells are marked on a couple of maps that will probably be presented by another speaker at this hearing.

How does this relate to the proposal to build a casino and hotel on the site at Stony Point and Wilfred Avenue? There is simply not enough water for the people already living in this area.

Of course, this seems strange when the same area becomes an annual flood plain. But there is a lot of substantiation.

There are many other things that do not make this specific and particular site for a casino and a hotel viable.

Five federally listed endangered species, including the Tiger Salamander, are found on this property. There are vernal pools that are protected by the State of California. The property is in the Williamson Act (an agricultural preserve act) and is part of the Urban Separator designation that is part of the Sonoma County General Plan and I believe is a state policy to have undeveloped property separating cities.

There is a drainage canal, deeded to and owned by the Sonoma County Water Agency, that runs diagonally across the property that is a part of the flood control drainage system. The site of the property regularly gets flooded after rainstorms and acts to prevent or minimize flooding to the east which includes 'F', 'G' and 'H' Sections inside the city limits of the City of Rohnert Park.

I have taken photographs and videos of the area during the last storms in Sonoma County. I have a collection of photographs showing water overflowing the above mentioned drainage canal, as well as several scenes of flooding on the roads that lead to the casino site.

Some of the **roads had to be closed** because of the depth of the flood water, this includes the **Rohnert Park Expressway** in the area just west of the Rancho Verde Mobile Home Park. I am aware of several other people who have also taken photographs or made videos of the flooding. I will make my photographs and videos available upon request.

These are specific questions in regards to the proposed site for the Graton Rancheria casino project. I would appreciate a response to each question.

1). **How are the five federally listed endangered species found on the described Graton Rancheria casino site going to be handled**?

(a) Will there be an appropriate investigation by an appropriate authorized agency to determine that each of the **five federally listed endangered species** do actually exist on the proposed property?

2) Will a separate investigation be done to the viability and the actual existence of **vernal pools** be done on the proposed casino property site?

(a) Will this investigation be done by a federal or state agency?

3) I understand that the proposed casino property site is currently in the **Williamson Act**. Will an appropriate verification be done and if it is found that the property is indeed in the Williamson Act designation, will the appropriate state laws regarding removal be followed? I believe this includes a hearing by LAFCO (Local Agency Formation Commission) for the appropriateness of changing the zoning designation from agricultural to something else (a casino and hotel).

4) Will the process for changing the zoning go through the normal and usual General Plan amendment process with the Sonoma County Planning Commission and the Sonoma County Board of Supervisors?

5) There is a drainage canal that runs somewhat diagonally essentially north to south that is deeded to the Sonoma County Water Agency. There are limitations to access to the drainage canal property that are strictly agricultural. This drainage canal cannot be eliminated or changed because of its importance to draining flood waters that are generated to the east and wend their way westward to intersect the North Branch of the Laguna de Santa Rosa.

6) In past years, the north and north east sections of Rohnert Park ('G' Section, 'F' Section and 'H' Section) have had episodes of flooding. In the recent rain season, 'G' Section had serious flooding. At the same time the fields of the proposed casino site have also been flooded by the overflow of the drainage canal that runs across it.

My question is in regards to what will be done to relieve this flood prone a rea in the future? We are talking about a tremendous about of water. Water that has historically flooded the lands from the base of the Sonoma Mountain all the way down to and past Stony Point Road.

7) What will be done about the annual **flooding closure** of the **Rohnert Park Expressway** just west of the Rancho Verde Mobile Home Park?

8) What will be done about the annual **flooding closure** of **Wilfred Avenue** in the area where Primrose intersects Wilfred?

9) What will be done about the **flooding problem** on **Scenic** and **Todd Avenues**?

10) What about the current and future matter of adequate ground water? The casino project is supposed to drill 1,000 foot deep wells. When we start having even more land mass subsidence from the collapse of the aquifers, will the Graton Rancheria and Stations Casino pay for the damages?

In a few words, this is one of the poorest sites for any kind of construction.
I will be presenting a copy of this letter to the hearing on the 10th. I will also include a copy of a video tape of the flooding problems I addressed in this letter.

Thank you,

Paul D Stutrud

Paul D. Stutrud

p.s. I am enclosing a video tape of this year's flooding episodes (to date)

I am also enclosing two documents that just came to me. They are in regards to the U.S. Military's (Navy) use of certain lands adjacent to the proposed casino site and the contamination left behind.

Subject: Fw: 03/09/2004 PRESS RELEASE: TOXIC WASTE THREATENS TO DERAIL CASINO PROJECT
From: "Montgomery/Jackson" <DONEGAL@peoplepc.com>
Date: Tue, 9 Mar 2004 14:49:26 -0800
To: <donegal@peoplepc.com>

Sent: Tuesday, March 09, 2004 10:20 AM
Subject: 03/09/2004 PRESS RELEASE: TOXIC WASTE THREATENS TO DERAIL CASINO PROJECT

Stop the Casino 101 Coalition

ttt

Sonoma County, California

www.stopthecasino101.com

FOR IMMEDIATE RELEASE: March 9, 2004: 10:00 a.m.

CONTACT: Marilee Montgomery

MILITARY TOXIC WASTE THREATENS HEALTH OF AREA RESIDENTS, PLACES ROHNERT PARK CASINO PROJECT IN JEOPARDY

ROHNERT PARK, CA: A World War II naval air station in Rohnert Park poses a threat to human health and safety, and has probably contaminated most, if not all, of the proposed Rohnert Park casino site.

According to a U.S. Army Corps of Engineers report obtained by the Stop the Casino 101 Coalition, the formerly used defense site, or FUDS, has been identified by the Department of Defense as being contaminated with waste that includes at least one 1,000 gallon underground gas and/or oil storage tank, unexploded ordinance, and lead from a firing range. The suspected contaminents include known carcinogens as well as lead, which is highly-toxic.

A report prepared by Environmental Geology Services, an environmental consulting firm located in Santa Rosa, indicates that the site poses a threat to human health and the environment, and the toxic contaminents have most likely spread to the surrounding countryside, including the casino site, which is immediately adjacent to and down-gradient from the old air base.

The area's groundwater supply may also have been contaminated, since the groundwater also flows downhill and west from the site, again, directly across the casino site. Casino developers plan to sink multiple 1,000 to 2,000 foot wells to supply the millions of gallons of water that the casino would require every day. .

The report also cites evidence from old aerial photographs that appear to show the existence of "ground scars". Ground scars mark areas of man-made disturbances of the earth, and are used by the Department of

Defense to locate burial pits, "dry wells" and trenches commonly used by the military to bury waste, rubbish, and, at the end of the war, surplus materials of all sorts. These pits were routinely filled with highly-toxic materials. The ground scars, which are of significant size, are located on the casino site itself.

In addition, the Rancho Verde Mobile Home Park is apparently located directly on top of the firing range, which was used by both the Navy as a machine gun range and by the Sonoma County Peace Officers Association for several years after the war. It is estimated that millions of pounds of lead were deposited in the soil during the years the range was in use. According to the report, the cost to clean up the firing range area alone could run to the tens of millions of dollars.

Citing the hazard to the health of area residents, Pastor Chip Worthington delivered copies of these findings to the Sonoma County Board of Supervisors and County Counsel today, and will meet with the Board at 2:00 p.m. this afternoon. This evening, he will address the Rohnert Park City Council to have the information read into City records.

Pastor Worthington will urge both the County and the City to ask the Department of Defense to perform the extensive on- and off-site testing of soil and groundwater supplies that will be required before any clean-up can begin. The process of testing alone can take years to complete, with clean-up taking years more, if and when funds become available for the work.

From what the Stop the Casino 101 Coalition has been able to learn from the US Army Corps of Engineers in Sacramento, there are no funds available for this project, a fact which has been confirmed by California's Department of Toxic Substances, which has begun it's own investigation into the matter.

The Department of Defense, which is the agency responsible for the clean-up of such sites, has recently been under fire by Congress and the GAO for consistently underestimating both the levels of contamination and the cost of clean-up for these old defense sites.

The City of Rohnert Park meets Tuesday evening at 6:30 p.m. in Council Chambers in City Hall at 6750 Commerce Drive, Rohnert Park.

Pastor Worthington, Attorney for the Coalition Marvin Pederson, and Press Liaison Marilee Montgomery, who discovered the existence of the air base and who did the preliminary research, will be available for interviews today.

ENDS

March 3, 2004

Mr. Marvin Pederson
Attorney at Law
1815 5th Street, Suite 200
Santa Rosa, CA 95401

RE: PRELIMINARY REVIEW
POTENTIAL HAZARDOUS MATERIALS IMPACTS
FORMER U. S. NAVY COTATI OUTER LANDING FIELD
AND DOWN GRADIENT AREAS
RHONERT PARK, CALIFORNIA

To Whom It May Concern:

This review and letter has been prepared in accordance the request of Mr. Chip Worthington.

PURPOSE AND BACKGROUND

The purpose was to conduct a preliminary review of some of the readily available information regarding the site history of the former U. S. Navy Cotati Outer Landing Field (Cotati OLF). The focus of this preliminary review is on potential hazardous materials impacts at and adjacent to the Cotati OLF from past military activities, specifically with regard to the proposed casino development west of the Cotati OLF. State and local regulatory agencies should be aware of potential hazardous materials impacts to the area.

Previous military use of the site is of potential concern because of possible future development of parts of the Cotati OLF and down gradient areas. Past site use may have resulted in hazardous materials impacts that may adversely impact area residents during construction, and might have possible negative impacts to future occupants of developed projects. Additionally there is concern that potential environmental conditions could adversely impact workers during construction activities. Military activities at the Coati OLF may have potentially impacted adjacent and down gradient areas such as the proposed casino site and these potential impacts should be more clearly defined and remediated prior to development.

SCOPE OF WORK

For this preliminary review the scope of work was limited to the following:

1. Review background summary history prepared by Marilee Montgomery,

2. Review available stereo pair air photos of the site and area (June 12, 1956, AV222-03, frames 8 & 9, scale 1:24,000, and later years),
3. Review U. S. Army Corps of Engineers Memorandum to Vincent Del Greco from Mark C. Charlton, dated September 10, 1999
4. Review report on Cotati OLF by TechLaw, Inc. prepared for the U. S. Army Corps of Engineers, Sacramento District, dated September 1999.

SUMMARY OF FINDINGS

Based on the results of the above review it is our opinion that the Cotati OLF has the following characteristics:

- The Cotati OLF consisted of two parcels of land: a 218.25 acre parcel and a 74.85 acre parcel. The 218.25 acre parcel was apparently the main airfield, but the location of the 74.85 acre parcel has not yet been determined.

- The Cotati OLF was operated by the U. S. Navy from approximately 1944 through 1949 and the facility included two runways, a crash and fire truck building, barracks, a control tower, oil and gasoline storage, small arms magazine and a machine gun range.

- Fuel testing was conducted at the facility by Standard Oil of California from 1957 to 1958 after it was declared excess government property. Also in the 1950's and later it was used as for drag racing and sports car racing.

- In 1983 the U. S. Army began identify inactive military facilities to be evaluated for possible toxic waste and hazardous materials issues. Aproximatly 90% of these facilities known as Formerly Used Defense Sites (FUDS), have been evaluated for clean up eligibility. Issues of concern at FUDS depend on past site activities and include: fuels and solvents in ground water, buried explosives and ordnance, asbestos, dump sites and lead contamination. The Cotati OLF was identified as a FUDS by 1996 and in 1999 the former Navy base was determined eligible for the FUDS mitigation program.

- LawTech was retained by the U. S. Army Corps of Engineers to assess the property (referred to as the 216.95 acre parcel). Their report makes reference to an oil storage building, gasoline storage, a small arms magazine and a machine gun range located on the facility, and underground storage tanks. The report indicated two categories of remedial / clean up projects: OE - Evidence of ordinance storage. Recommends finding the locations of waste sites that may

contain unexploded ordnance, and CON/HTRW - Evidence of underground gasoline storage tanks. Recommends locating tanks and testing soil for possible contamination. For some reason they did not discuss lead contamination impacts from the machine gun firing range.

- Analysis of stereo pair air photos of the Cotati OLF taken in 1956, some seven years after Navy operations show the runways, access roads, probable aircraft machine gun test range berm (near west end of runway), and remaining buildings / building pads. The property from the west end of the runways to Stony Point Road are pockmarked with numerous circular, crater like features, and this area contains a larger area of disturbed soil. Although the origin of these features is not known, they could be related to previous military activities such as waste disposal or ordinance disposal. These areas are down gradient from the runways and appear to be outside of the 218.25 acre parcel comprising the main Cotati OLF. This area might contain the previously referenced 74.85 acre parcel.

CONCLUSIONS

The U. S. Army Corps of Engineers records show the Cotati OLF site as a declared potential hazardous waste site which has been recommended for further exploration and possible remediation. The presence of the Cotati OLF has the potential to impact adjacent and especially down gradient property such as the area of the proposed casino development.

Although the amount of aircraft maintenance was performed at the site is not known, if chlorinated solvents were used (a common WW-II era practice in aircraft parts cleaning) both shallow and deep ground water resources could be impacted. These kinds of liquid hazardous wastes were typically disposed of in on site "dry wells".

To date no known effort has been made to locate the underground storage tanks (USTs) and determine their impacts to the local ground water. Underground fuel tanks from this era have a high potential to have leaked and caused contamination to the shallow ground water with compounds that include benzene, toluene, xylenes and ethylbenzne.

As with the USTs, no known effort has been made to locate possible buried unexploded ordinance, even though this has been recommended by the U. S. Army Corps of Engineers contractors.

The location of the machine gun range has not been verified or explored with regard to lead contamination. However our preliminary air photo review suggests there was a berm off the western end of the runways that may have been used for testing aircraft machine guns.

Because of the known and suspected hazardous materials characteristics of the Cotati OLF and its proximity to the proposed development to the west (including the proposed casino project) the U. S. Army Corps of Engineers in cooperation with the Sonoma County Environmental Health Division, the California Department of Toxic Substances Control, and the North Coast - Regional Water Quality Control Board should make it a priority to:

- ❑ Locate the USTs and explore the vertical and lateral extent of possible ground water contamination, especially with regard to benzene a significant constituent of gasoline and a known carcinogen. If present, this contaminant has the potential to impact existing and future water wells in the area and down gradient form the former USTs.

- ❑ Analyze soil and water samples for chlorinated solvents during the soil and ground water exploration for the USTs. This would be prudent since if present, chlorinated solvents could impact deeper ground water zones and impact the regional ground water resource. In addition further historical research, in conjunction with a soil gas screening survey should be done to determine locations of aircraft maintenance activities and identify related solvent waste disposal sites.

- ❑ Conduct the necessary research to locate/ verify the former machine gun range and undertake a through soil exploration and testing program. If this site is in the area of proposed future development there could be significant human health risks to construction workers and down wind residents due to lead dust exposure. Once the machine gun range is identified the area should be properly explored and sampled, and remediated before any development to mitigate this potential health risk. Based on the available information on the period of use of the range and the resulting amount of lead (as well as phosphorous from tracer rounds), remedial costs could be in the millions to 10's of millions of dollars, depending on the volume of soil and the area of dispersal.

- ❑ Conduct the necessary research to locate potential buried ordinance and remove and safely dispose of these materials if found. If these potential disposal sites are located in proposed development areas, they could pose a high risk to construction workers and subsequent facility occupants.

- ❑ The U. S. Army Corps of Engineers in conjunction with County and State agencies should make it a priority to conduct the necessary research to identify the locations of the reported and suspected hazardous materials impacts to the Cotati OLF, explore and define the extent of off site impacts to soil and ground water (deep and shallow) and conduct the necessary remediation. As development is encroaching on the undeveloped property in the area it would be prudent to locate and

remediate any hazardous materials related to the former military activities as soon as possible. The time to conduct the needed research, investigation and possible remedaition could take a few to several years.

LIMITATIONS

This work has been performed in accordance with generally accepted environmental review practices for similar preliminary reviews conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

The scope of work performed to complete this preliminary information review was limited in nature. While we consider work of this type to be valuable in the preliminary evaluation of potential hazardous materials or wastes, we also must alert the reader that this review may not reveal hazardous materials releases that have occurred. Also, site conditions can change with time, and our assessment was not intended to predict future site and off site conditions. Because of the limited nature of this review, site history was developed based only on information provided and a review of limited government documents. This report is not a risk assessment and the Scope of Work provided does not include a determination of the extent of, nor the environmental or public health impact of, known or suspected hazardous materials or wastes.

It is understood by the parties hereto that the Client who has requested this review will use the report (in addition to other information) to provide information to local and state public agencies to assist those regulatory agencies in making decisions about development of property at and near the Cotati OLF. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of properties that may result if the Consultant's report or information generated is used for other purposes. Also, this report is issued with the understanding that it is to be used only in its entirety.

CLOSURE

I trust the foregoing preliminary evaluation and opinions are sufficient for the State and County regulatory agencies to determine if they should, in the public interest, follow up on these environmental concerns. If you or the regulatory agencies involved have any questions, please give me a call.

Sincerely,
ENVIRONMENTAL GEOLOGY SERVICES

Marc W. Seeley, RG, REA-II
Principal Geologist

RECEIVED
MAR 1 0 2004
National Indian Gaming Commission
Region II, Sacramento, CA

March 10, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW 9th Floor
Washington, DC 20005

Re: Deis Scoping Comment, Graton Rancheria Casino Project

Dear Ms. Nagle;

As a 16 year resident of Rohnert Park, CA, I can tell you that without a doubt we do not have the infrastructure to support the Casino proposed by the Federated Indians of the Graton Rancheria.

We need a detailed study as to the effects of increased crime a Casino of this size would have on the communities within 50 miles of this proposed site. There have been numerous studies that show crime follows gambling. U.S. News & World Report has reported that crime in casino communities is 84% higher than the national average.

We need a detailed study comparing the financial impact of police and fire resources, specific to the cities of Rohnert Park, Santa Rosa, Cotati, Sebastopol and the Sonoma County Sheriff department.

We need an additional study outlining the impacts as they would defer in Rohnert Park which does not maintain separate police and fire officers, but officers that act in dual roles.

We need a detailed study based on the census of the surrounding communities of the increase elder abuse in the area within 50 miles of a proposed Casino of this magnitude.

We need a detailed study based on the census of the surrounding communities of the potential of the increase in child abuse in the area within 50 miles of a proposed Casino of this magnitude.

We need a detailed study based on the contributing factors of drug abuse, mental disorders, early gambling that exist in the surrounding communities that will increase the number of pathological gamblers in our communities within 50 miles of a proposed Casino of this magnitude.

We need a detailed study outlining the increase in number of suicides due to problem gambling that will occur within 50 miles of a proposed Casino of this magnitude.

We need a detailed study outlining the various types of programs for the prevention of elder abuse associated with gambling, specific to each of the surrounding cities of Rohnert Park, Cotati, Sebastapol, Penngrove, Santa Rosa and Petaluma and the annual cost of each program.

We need a detailed study outlining the various types of programs for the prevention of child abuse as associated with gambling, specific to each of the surrounding cities of Rohnert Park, Cotati, Sebastapol, Penngrove, Santa Rosa and Petaluma and the annual cost of each program.

We need a detailed study outlining the various types of programs for the prevention of pathological gambling specific to each of the surrounding cities of Rohnert park, Cotati, Sebastapol, Penngrove, Santa Rosa and Petaluma and the annual cost of each program.

We need a detailed study as to the increased cost associated with the arrest, court proceedings and cost of incarceration due to increased crime that will be attributed to a Casino of this magnitude.

I am also concerned about the negative effects to our local economy a proposed Casino of this magnitude with a food court, 5 restaurants a 300 room hotel and a day spa. The proposed Casino is within 4 tenths of a mile from Rohnert Parks major shopping area, which include department stores, eateries, restaurants, movie theatre and spa services.

We need an independent economic impact analysis, covering at least a 50 mile radius of the proposed Casino site.

Transportation has been an ongoing problem along the 101 corridor and all current studies for changes to widen 101 are on hold due to budget constraints. They do not include the additional impact of a 24 hour World Class Casino.

We need an analysis of the traffic impact this Casino would have on the 101 corridor, to include the Novato narrows.

We need an analysis of the costs associated with widening of 101 through the Novato narrows up to the last Rohnert Park exit.

We need a traffic impact and review of the current under and over pass designed for Wilfred Ave. to determine if its proposed design accounts for the added traffic this proposed Casino would bring to the area. We need a cost analysis associated with any amendments to the current plan.

We need a traffic impact analysis and cost analysis of all proposed changes needed to the Rohnert Park Expressway, Petaluma Hill Rd., Adobe Rd., Railroad Ave., Stony Point Rd., Wilfred Ave., Golf Course Rd., Primose Ave. and all other roads to be affected by the increased traffic due to the proposed Casino.

Water supply is of utmost concern. We need a ground water management review of Sonoma Counties water supply to determine if there is adequate ground water to sustain a Casino of this size and magnitude for the next 20 years.

We need a review of the impact the proposed wells and water sewage plant proposed for this site will have on residential wells and septic systems in the surrounding area.

This Casino is proposed in land zoned for agricultural use and acts as a community separator as part of our open space district. We need an independent study to determine how this proposed Casino abides by the county General Plan.

We need an environmental study to determine effects of urban sprawl on local communities.

We need an environmental study to determine how this proposed Casino will maintain the visual aspects of an Open Space District.

We need an environmental study to determine the noise affects a Casino of this magnitude will have on the neighboring mobile home park and surrounding residences. The report should indicate all possible solutions to curtail all increased noise impacts and costs associated with each solution.

After review of all studies of this proposed site you will come to the conclusion that this 16 year resident has come to: our infrastructure can not support a Casino of this magnitude. Alternative sites must once again be reviewed. An alternative site should have the intent of Proposition 1A and its voters in mind. An alternative site should not be within 5 miles of an existing residential neighborhood, school or business district. The Federated Indians of the Graton Rancheria's must chose an alternative site, it would prove to the citizens of California that their, as well as other tribes, main concern is to place Casinos in locations that have minimal impacts on surrounding communities.

Sincerely,

Anita Felton

Anita Felton
1525 Mathias Pl.
Rohnert Park, CA 94928 (707) 664-9529

Encl: Resolution No. 03-100
Articles

THE WITHIN INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE.

ATTEST: OCT 21 2003

EEVE T. LEWIS
County Clerk & ex-officio Clerk of the Board of Supervisors of the State of California, in & for the County of Sonoma.
By _____ Deputy

#28
RESOLUTION NO. 03-1100

Date: October 21, 2003

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SONOMA, STATE OF CALIFORNIA, OPPOSING THE PROPOSAL BY STATIONS CASINOS AND GRATON RANCHERIA TO DEVELOP A CASINO ADJACENT TO ROHNERT PARK AND OPPOSING OTHER GAMING FACILITIES INCONSISTENT WITH THE GENERAL PLAN

WHEREAS, the Federated Indians of Graton Rancheria, a federally recognized Indian tribe ("Tribe"), and Stations Casinos, a Nevada Corporation, have proposed to build a major casino and resort on agricultural and community separator lands in the unincorporated area adjacent to the City of Rohnert Park; and

WHEREAS, the proposal is inconsistent with the County General Plan, located in a community separator zone, outside Rohnert Park's Urban Growth Boundary, and within the Laguna de Santa Rosa's flood plain; and

WHEREAS, the General Plan was the subject of analysis in an extensive public review process and Environmental Impact Report which was approved by the Board of Supervisors and is intended to guide decisions on future growth, development and conservation of resources; and

WHEREAS, once the federal government takes land into trust on behalf of the Tribe, the Tribe has the legal authority to preempt land use controls and safeguards contained in various laws and regulations including the County's General Plan and the California Environmental Quality Act, which are intended to assure that land uses contrary to the community health, safety, and general welfare are avoided and environmental impacts mitigated; and

WHEREAS, the Tribe was restored by an Act of Congress in December, 2000, based in part on its promise not to engage in casino gaming; and

WHEREAS, the federal legislation restoring the Tribe contains language that could be used to circumvent the normally required environmental review and administrative process for taking land into trust by the United States government for the benefit of the Tribe; and

WHEREAS, under existing federal requirements, there is not any effective coordination of gaming proposals or other major tribal enterprises to examine either the cumulative impacts of these disparate projects or consistency with the General Plan; and

WHEREAS, large tribal gaming projects will impact local and regional public infrastructure, including highways, streets, transit systems, water, wastewater, energy systems and resources, affordable housing and emergency services, both built and yet to be built; and

WHEREAS, without appropriate mitigation, the proposed developments will have substantial off-reservation negative environmental impacts and place substantial burdens on the public infrastructure which otherwise must be borne by County taxpayers, residents, visitors and businesses; and

WHEREAS, rapid construction of tribal gaming facilities throughout California have caused local governments to experience serious, adverse impacts related to off-reservation economic, environmental, health and safety issues; and

WHEREAS, to date, the conditions placed on Indian gaming to achieve and preserve the environmental, public safety, and public health objectives of both state and local government have been insufficient to prevent such adverse impacts; and

WHEREAS, when California voters approved Proposition 1A (Indian Gaming) in March of 2000 as a means of supporting the goal of Indian economic development and self-sufficiency, they were not aware that such approval would allow intense development of lands not previously held in trust, without regard to locally approved general plans or any meaningful environmental review or protection; and

WHEREAS, under the provisions of Proposition 1A and the Tribal-State Compact, local communities have not been granted effective input into the development of proposed tribal casinos and the State has not effectively sought redress for significant environmental impacts these gambling casinos impose on local communities; and

WHEREAS, on February 6, 2003, the California State Association of Counties, with the input of Sonoma County, adopted a policy document that includes seven principles of critical concern to counties, including a principle that tribes and local governments enter into binding and enforceable local agreements for the mitigation of off-reservation impacts that arise from a local gaming project; and

WHEREAS, Station Casinos and the Tribe have an agreement to purchase

approximately 360 acres of agricultural and community separator land west of Rohnert Park and intend to place the land into trust for the purposes of casino development - including an extensive gaming complex, with a 300 room hotel, spas, restaurants, a 2000 seat entertainment venue, parking and other support services; and

WHEREAS, a thorough environmental review has not been conducted on the project but preliminary information indicates that the proposed casino could overwhelm Highway 101 capacity by generating 12,000 to 15,000 additional trips per day, and will delay the Wilfred Avenue interchange project which has been funded by the State; and

WHEREAS, the proposed casino project will have other currently undetermined local and regional fiscal, environmental and social impacts; and

WHEREAS, the proposed Graton Tribe casino proposal is neither subject to a thorough CEQA-like process that identifies fiscal and environmental impacts that are then mitigated by the Graton Tribe, nor administrative consideration by the Department of the Interior to determine if the use of this land will have significant detrimental impacts on the neighboring communities which outweigh the benefits to the Tribe.

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors supports revisions in federal law to require that all tribal trust applications are subject to discretionary review by the Secretary of the Interior to ensure that they meet all regulatory criteria for acceptance of property into trust and that any proposed trust land intended for Indian gaming satisfy the two part test contained in 25 U.S.C. §2719 (b).

BE IT FURTHER RESOLVED that the Board of Supervisors opposes the development of a casino on the proposed site adjacent to Rohnert Park.

BE IT FURTHER RESOLVED that Board of Supervisors opposes the creation of a gambling casino resort on any site that is inconsistent with the General Plan.

Supervisors:

Brown no Kerns aye Smith aye Reilly aye Kelley aye

Ayes 4 Noes 1 Abstain 0 Absent 0

SO ORDERED.

Gamble Tribune
WWW.GambleTribune.ORG

PARENTS ARRESTED FOR LEAVING CHILDREN IN VAN AT CASINO

14.07.2003

gambler

Police say the children had been in the van for about 30 minutes. The windows were rolled down and the keys were in the ignition.

Bettendorf, Iowa — Two people from Illinois are accused of leaving two children in a van while they went to Isle of Capri Casino in Bettendorf, Iowa.

Authorities say 32-year-old Johnny Matthews of Rock Island and 37-year-old Dana Walker of East Moline are charged with child endangerment.

The children - ages two and six - were found by security guards in the riverboat's parking garage on June 23rd. They were unharmed.

Police say the children had been in the van for about 30 minutes. The windows were rolled down and the keys were in the ignition.

Temperatures that day were in the upper 80s to lower 90s.

Matthews is the father of one of the children and Walker is the mother of both. If convicted, they could be sentenced to up to one year in jail.

The Associated Press

Drug cash laundered at casinos

By COLLEEN KRANTZ
Des Moines Register Staff Writer
12/22/2003

Iowa drug dealers have pinpointed casinos as ideal places to quietly launder the large bills they earn selling methamphetamine, cocaine or other illegal drugs.

Besides unwittingly helping to erase the trail of drug money to dealers, Iowa's thriving casinos provide all-night entertainment to fill the sleepless hours that come with meth highs, drug users and addiction counselors say. Drug users, who are prone to other addictive behaviors, often add gambling to their lists of problems, experts say.

"The general public isn't really aware of the tie, and it's something we've become aware of probably just in the last couple years," said Bob Thacker, associate director at Community and Family Resources, a Fort Dodge treatment center. "It makes it really hard to treat the meth addict."

Dexter Temple of Davenport, a confessed former drug dealer who has served 19 months in Iowa prisons for burglary and a probation violation, said he used a Davenport casino to break large bills that might attract attention elsewhere and get rid of bills that he worried might have been marked by undercover drug officers. He said he knew the casino rules and was careful to avoid any transaction over $10,000, which would trigger a paperwork requirement.

"I always had this feeling that I've got this (drug) money and I've got to account for it," said Temple, 39, who has been undergoing treatment for drug and gambling addictions for 18 months. "I'd take it down to the boat, gamble and win money or lose money and, with the money I got back, I felt safe taking it to the bank."

Illegal drug dealers' and users' association with gambling is likely to grow as Iowa's methamphetamine epidemic worsens, Temple said.

"Meth is a big thing in Iowa, and people are selling meth and making a lot of money," he said. "They have to find a way to launder that money."

Last year, meth sent 800 Iowans to prison, eight times more than in 1995. It drove about 5,300 into treatment, up 43 percent from five years earlier.

Iowa has 16 casinos where gamblers leave behind about $1 billion annually, with some counties pushing for more gambling licenses - an issue that gaming regulators left to state lawmakers.

Difficult to measure

There isn't a perfect way to measure the presence of drug dealers and users at the casinos.
"Certainly we recognize it's the nature of the business that for anyone who gets illegal proceeds, there's a likelihood they'll spend it in the gaming facilities," said Steve Bogle, assistant director for the Iowa Division of Criminal Investigation, which stations officers at the casinos. The division has handled about 150 drug cases at the state's gaming facilities since 1999.

A recent study by Harvard Medical School Division on Addictions found that nearly one of every four Iowans who sought help for gambling had also been treated for substance abuse.

"They may be selling drugs to get money to gamble or gambling to get money for drugs," said Frank Biagioli of the Iowa Gambling Treatment Program. "Then you have the people who are in the mode of dealing drugs and may possibly need to launder some money."

Mark Hein, the Des Moines-based resident agent for the U.S. Drug Enforcement Administration, said law enforcement officials are aware of the connection.

"We've known drug dealers to frequent casinos," Hein said. "When you think about it, you've got some money in your pocket or you're making money off drugs, it'd be a good place to go and hit a jackpot and have some "legitimate' money."

Concerns that criminals might be using casinos more frequently to launder money prompted the federal government to create a new form for casinos to use in reporting any suspicious activity involving amounts over $5,000. The rule went into effect last year.

"It was becoming more and more difficult to launder at the traditional places, like banks," said Kevin Jimerson, an Internal Revenue Service special agent based in St. Louis. "So they were using casinos more," prompting the federal government to adopt the new rule.

The difficulty for the casinos is deciding what should be considered suspicious, said Bogle, the state DCI agent.

"With the amount of traffic we see, it's not unusual to see people coming in with $5,000 or $6,000," he said. To pursue federal charges of money laundering or state charges of criminal conduct, an officer would need to be able to prove that the money came from an illegal source, which is difficult to accomplish, Bogle said.

Training in Chicago

This year, the IRS, which investigates money laundering, held a training session at the Illinois Gaming Board's facility in Chicago regarding the new requirement to track suspicious activity at casinos. "Part of it was a reminder to watch for . . . people tailoring transactions so they were just under $10,000, such as $9,000 or $9,500," said Jim Wagner, a deputy administrator with the Illinois Gaming Board. "That's suspicious and should now be reported."

A special task force in Illinois has kept an eye on drug dealers who frequent the casinos, Wagner said. Laundering clearly happens, but the task force has not found any large-scale evidence of it, he said. Temple, the former dealer and gambler, said he became a compulsive gambler as he tried to get off cocaine. It's common that a person trying to overcome one addiction will turn to another, experts say. "No one starts out automatically being a compulsive gambler, but being addicted to one thing makes it easy to get addicted to another, because they already have the predisposition," said Michelle Dunn, a gambling counselor at Alcohol and Drug Dependency Services in Burlington.

Dunn pointed out that drug users gravitate toward casinos as they look for entertainment while high. "When they take meth, they are up at night and, in many towns, the only place open all night long . . . is the casino," she said.

It quickly becomes a habit.

Temple said he spent about $10,000 at a Davenport casino over one eight-month period. He's certain he wasn't the only drug dealer or user who got into the same habit.

"Go around the craps table, see how many individuals are standing around, and you can tell the kind. Just take a long look at some individuals," he said. "I think drug dealers just stand out.

"But how are you going to stop it? It would basically be discriminating against a certain group of people."

Adrenaline rush

Kenny Morrison, a former meth dealer whose experience was recounted last month in The Des Moines Register. spent $25,000 at a Burlington casino during one month.

"There's a certain level of adrenaline rush to gambling, the thrill of the moment, so to speak," Morrison said. "You kind of get caught up in that and lose track of the meaning of money."

Because of the link between gambling and illegal drug use, the state's treatment centers should work to train more of their substance abuse counselors to also pinpoint and treat gambling addiction, said Thacker, the Fort Dodge treatment center official.

"It's usually just a couple of people, but it needs to be that everyone is cross-trained, because we are seeing more and more of this," Thacker said.

Biagioli, with the Iowa Gambling Treatment Program, said, however, that those now trained to help compulsive gamblers are able to meet the demand. Fewer people have been asking for help in recent years, possibly because there is less money being spent to advertise the 1-800-BETS OFF help line, he said.

In 1996, the Iowa Gambling Treatment Program spent $1.4 million - money from the casinos - on advertising. The help line had nearly 4,500 calls that year. In 2002, it spent $293,000 and had just over 1,550 calls.

"It's not that there aren't more people out there needing help, but they aren't inspired, shall we say, to call for help because they haven't heard about it," Biagioli said.

The casinos help promote the 1-800-BETS OFF line but don't typically focus on substance treatment to the same degree, he said.

Dad deals with heavy guilt, debt
Gambling son was killed in Verona

By Steven Elbow
July 10, 2003

Jason McGuigan was living like a high roller when he was gunned down with two other men at his Verona apartment two weeks ago, but what he left behind was debt.

"There's no money even to bury him, and I don't know how I'm even going to do it," his father, Robert McGuigan, said Wednesday.

Jason McGuigan, who will be buried on Friday, leaves behind a 3-year-old son, Isaiah, who had been in his custody for the past year.

The family has established a memorial fund for the son, and for funeral expenses. Contributions can be made at any First Federal branch to the Jason C. McGuigan Memorial Fund. Contributions can also be made at Cress Funeral Home.

Jason McGuigan, 28, Dustin Wilson, 17, and Daniel R. Swanson, 25, were killed in the early morning hours, apparently while they slept, at McGuigan's duplex at 305 S. Main St. on June 26. Meng-Ju Wu, a 19-year-old resident alien from Taiwan attending the University of Wisconsin-Madison, has been charged with three counts of first-degree intentional homicide. He is currently in New York, fighting extradition to Dane County.

Investigators are still trying to pin down a motive in the triple-slaying, but authorities say McGuigan's involvement in high-stakes gambling and Wu's gambling losses appear to be factors.

The bodies were found by Jason McGuigan's 86-year-old aunt, Elaine Hendrickson, who dropped by the apartment on the afternoon after the murders to drop off McGuigan's mail that was delivered to her residence. The two were close, Robert McGuigan said. Jason referred to her as grandmother.
"It's etched in her mind," he said. "The stress she's under is just immense. She saw the blood. She saw the fixed eyes. She saw it all. The viewing (Wednesday) was real hard on her because she could still see in her mind what he looked like on that bed."

Robert McGuigan said his son's gambling had been his poison since he was in his teens. But he said Jason always strove to be successful, and his skill with statistics and numbers, despite a learning disability, drew him to gambling.

"He was good at it," he said. "He knew what he was doing."

McGuigan said he had tried repeatedly to intervene in his son's lifestyle, contacting authorities in Sauk County, where Jason went on gambling binges at Ho-Chunk Casino, and seeing a sports psychologist who specialized in gambling addictions.

About three years ago, Robert McGuigan, who has experience in the food and beverage industry, tried to buy property for a tavern with the intent of steering Jason's energies elsewhere.

"I was hoping I could have found a spot where I could have had him with me," he said.

He said Jason was excited about the prospect, but "it never did materialize."

Robert McGuigan, who works as a purchaser for the UW Biochemistry Department, said he still has plans to buy that tavern.

"I don't know how," he said. "I don't know when. But I'm going to get a place, and it's going to be called Jay's Place."

Jason's gambling caused father and son to become estranged about a year and a half ago.

"It was a case of tough love," he said. "Dad had to put his foot down. Dad didn't like the gambling and what he was into. It was hurting family, hurting friends."

His failure to help his son now leaves him with guilt, and the fact that Jason's gambling may have led to the deaths of others is a "triple whammy."

"I've got triple guilt, for my son and for the others," he said.

He said he hasn't yet spoken with the families of the other dead men.

"It's like there were two parts to Jason," he said. "There was the gambling part, and there was the real Jason."

He described his son as a loving, compassionate person who had a natural affinity for children.

"Since he was a teenager, he had a way with children and kids," he said. "It was just natural."

He said Jason's son thrived in his care.

McGuigan said his son also loved animals.

"He said he could never kill a deer," he said.

That made it all the more unbelievable when he heard that Jason McGuigan had bought a gun, apparently because he was afraid his new Cadillac Escalade SUV, worth about $60,000 and equipped with an expensive sound and video system, might be car-jacked. Police believe that same gun, which Wu allegedly had access to, was used in the murders. While the gun's case and other evidence - including a pair of sandals with traces of Wilson's blood - were found in dumpsters near Wu's Gilman Street apartment, police are still searching for the weapon.

"It shocked me, my son having a gun," Robert McGuigan said.

E-mail: selbow@madison.com
Published: 10:00 AM 7/10/03

Gamble Tribune
WWW.GambleTribune.ORG

GAMBLERS' ABUSE OF ELDERLY RISING, WARNS AGE CONCERN

28.01.2004

contact Gamble Tribune

Gambling addicts are threatening their aged parents to get money for their activities, Age Concern says.

The chief executive of the organisation's Canterbury branch, Andrew Dickerson, said financial abuse of the elderly was on the rise, with much of the proceeds going to fund adult children's addictions.

Theft of money from the elderly by family members or close associates was increasing and accounted for about half of "elder abuse" cases, Mr Dickerson said.

Source: NZPA, www.nzherald.co.nz

Gambling addicts are threatening their aged parents to get money for their activities, Age Concern says.

The chief executive of the organisation's Canterbury branch, Andrew Dickerson, said financial abuse of the elderly was on the rise, with much of the proceeds going to fund adult children's addictions.

Theft of money from the elderly by family members or close associates was increasing and accounted for about half of "elder abuse" cases, Mr Dickerson said.

A worrying aspect was the frequent link with the offenders' gambling and substance addiction problems, he said.

Problem Gambling Foundation spokesman Mark Vivian said staff were finding cases of adult children applying emotional, and sometimes physical, pressure to elderly parents to fund gambling difficulties.

Several cases had come to light in Christchurch late last year, most involving abuse of elderly widows, Mr Vivian said.

He could not say whether the problem was increasing.

Mr Dickerson said most older people had loving and supportive families. Those ripping off their parents were "a small but growing group".

Age Concern was seeing more than 30 cases of elderly people being defrauded each year. Large sums of money were commonly involved.

Canterbury University social work lecturer Verna Schofield said the link between financial abuse and addictions was strong and significant.

Elder abuse was "very much under- reported and under-recognised".

She said research showed reported cases were "the tip of the iceberg" because older people often were reluctant to talk about it, out of loyalty to family members.

* Former gambler Graham Bruton, banned by the TAB for a credit betting scandal, wants to try his luck again.

But the TAB has refused his plea to punt after advice from a problem gambling expert.

Mr Bruton was forced to submit to an assessment by a counsellor before the TAB would reconsider its indefinite ban.

"Their strong recommendation was that it would be better not to allow him to open an account," TAB chief Jim Leach said."They have basically come to the conclusion that he has gambling problems."

Nicknamed Steel Balls after a series of massive plunges, Bruton was banned by the TAB when he could not meet an illegal $20,000 credit bet two years ago.

Bruton fled from Christchurch to Thailand, where he revealed an all-consuming gambling addiction.

A shattering run of losses cost the high-roller his home, his marriage and hundreds of thousands of dollars in sport and horse-race winnings.

Bruton approached the TAB just before Christmas about betting on this year's National Rugby League matches.

He took legal advice on the TAB ban, but decided it was not worth fighting.

Bruton has rebounded in remarkable style, thanks to his majority ownership of champion trotter Lyell Creek.

After Bruton fled the credit bet fiasco, the horse bankrolled US$843,705 ($1.23 million) in North America.

The money let Bruton repay the TAB and sizeable debts to Australian bookmakers. It also let him build a $700,000 home near Addington Raceway.

Casino Gambling/Elder Abuse Issues

The following is our brief draft paper on elder abuse issues related to casino gambling.Your comments and suggestions will be greatly appreciated. Thanks again for suggestions which went into the beginning draft.
Grant Parker

DRAFT

Citizens for Better Care
Elder Abuse Prevention Education
Elder Abuse Issues Associated with Casino Gambling
Elder Abuse Relevancy.

Each state may have different legal definitions of elder abuse. In Michigan, adult abuse is basically harm or threatened harm to the health or welfare of a vulnerable adult . Vulnerability applies to mentally or physically impairment or suffering from the frailties of old age. We are generally speaking of adults 60 years of age or older who are mentally or physically impaired. The basic purpose is to protect the rights of these seniors including the right to self determination and decision making. The adult protective services law, and adult protective services within the Family Independence agency are this states basic protection tools. The law defines several types of abuse i.e. physical, mental, neglect, self neglect, and exploitation- the latter being the misuse of one*s property, assets, or personal dignity. Financial exploitation seems at first glance to be the most relevant in the context of casino gambling, but because gambling may result in loss of means for meeting basic human needs, self neglect could be another basis for protection of a vulnerable elder person.

Expert Opinion.
Experts in elder abuse, such as Rosalie Wolf, University of Massachusetts, indicate that there is no significant literature on casino gambling as an elder abuse issue. However, some experts see casino gambling as akin to sweepstakes and telemarketing which targets seniors who are willing or anxious to take gambles on scams. Currently there is a growing national focus on the sweepstake problem, with lead being taken by Senator Collins in the United States Senate. It appears that casino gambling has not been seen by most experts as an elder abuse issue. However, statistical inquiry has been lacking, and adult protective services does not pick up gambling in its data base. Gambling as an addiction is increasingly recognized but not specifically as an elder abuse phenomenon.

Casino Gambling per se.
In and of itself, casino gambling is recognized as a form of recreation which is legal and socially accepted among many groups of seniors. Citizens for Better Care*s (CBC) concern addresses forms of exploitation or abuse associated with gambling. Where other forms of exploitation reach seniors individually or in their homes, casino gambling problems.often occurs with groups of seniors. It is common for senior centers throughout the state to bus seniors to a casino. These trip expenses are subsidized and seen as an important part of recreational programming by local senior officials. Often the casinos actually pay seniors to get them started. The casinos maintain strong security on the premises but probably for the main purpose of protecting casino assets. Often seniors are bussed into casinos in groups, making it easier for more vulnerable seniors to have access. Casinos depend heavily on their senior clientele. Unlike the lottery, the casino experience can also meet senior needs for socialization . The congregation of seniors gives perpetrators an opportunity to prey on potential victims in various ways on or just off the premises.

Examples of Elder Abuse and Exploitation
(1) A senior gambles to the extent that basic necessities of food , shelter, and medicine can no longer be provided. If this senior is vulnerable according to the law, this could be a case of self neglect. Prevention steps would include conspicuous postings of gambling dangers within senior centers, postings within casinos, training of senior and casino staff in indicators of abuse gambling, training of protective services staffs to include gambling in their case assessments, inclusion of gambling factors incidence in programming reporting, and training in the resources available to deal with this particular type of problem.

(2) Gamblers in the household of a senior exploit the senior financially to support their gambling habits. Such exploitation can take the form of stealing, extortion, physical or mental abuse. General prevention and reporting techniques apply here, including training in gambling and financial institutions to recognize signs of such exploitation.

(3) Mentally impaired seniors may be cajoled, pressured, or coerced into gambling by facility or others who hope to profit from their winnings. This is financial exploitation possibly augmented by other forms of abuse. General prevention and reporting techniques apply here, including training in gambling and financial institutions to recognize signs of such exploitation and surveilance by law enforcement and regulatory agencies.

(4) Impaired seniors may be potted and marked in the gambling casino for future exploitation or abuse outside the casino. General prevention and reporting techniques apply here, including training in gambling and financial institutions to recognize signs of such exploitation and surveilance by law enforcement and regulatory agencies.

(5) The vulnerable senior may be, or become, an addict. While this is not considered senior abuse, it is an illness warranting treatment. Further, the addiction may be accompanied by other problems to justify a report as self-abuse so that a comprehensive case assessment and treatment plan can be made.
Elder Abuse Research and Program Evaluation. Program or demographic information, evaluation and research on senior abuse and exploitation in gambling environments is needed to assess the extent of the problem in this context.

Conclusions.
Potentially, as gambling opportunities grow with the proliferation of gaming establishments, serious abuse and exploitation problems loom ahead for vulnerable and impaired seniors. We do not now have adequate information to assess the extent of the existing problem and we lack the means currently to better assess the problem. However, in attacking these problems, the basic right of seniors to self determination and enjoyment of a legal form of entertainment needs to be respected.

Recommendations-
--Update adult abuse program and research information bases to include key gaming data.
--Update Adult Protective Services (APS) manuals to include the possibility of abuse and exploitation, and train APS staffs in assessing for its relevance in adult abuse cases and in recognizing and using appropriate resources.
--Consider elder abuse and exploitation prevention policy in senior centers and casinos to build in safeguards and alerts at senior centers and casinos.
--Develop public information tools to address the problem, such as warning and reporting posters prominently displayed in casinos and senior centers and update exploitation brochures to identify the potential problems.
--Train casino security and senior center personnel in indicators which may suggest gambling induced elder abuse and exploitation and give rise to reporting to adult protective services.

Grant Parker
Elder Abuse Prevention Education Specialist
Citizens for Better Care
4-23-99

718

RECEIVED

MAR 10 2004

National Indian Gaming Commission
Region II, Sacramento, CA

DEIS SCOPING COMMENTS

Graton Rancheria Casino Project

To: Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W, 9th Floor
Washington, D. C. 20005

From: Pamela A. Miller
4306 Primrose Avenue
Santa Rosa, California 95407

Comments shall relate to specific items listed on NEPA Compliance Checklist (FWS Form 3-2185).

1) This development will have significant adverse effects on public health and safety:

- Increased air pollution from thousands of daily, additional vehicle trips on nearby roadways.
- Increased water pollution due to "non-point source" contamination from vehicle runoff, particulate matter generated by excessive vehicle exhaust settling on the ground above the aquifer, use of toxic building materials to raise and prepare building pad in a federally recognized flood plain (petroleum based asphalt products, etc.).
- Contaminated residential well water due to existing neighborhood septic systems being subjected to additional flooding as a result of water displacement from the construction of this development in a flood plain.
- Residential exposure to raw sewage ("effluent surfacing") as a result of existing neighborhood septic systems being subjected to submersion due to the displacement of flood waters.
- Increased potential for traffic accidents due to intense fog conditions noted in the area of development.
- Increased potential for traffic/pedestrian accidents due to the nature of existing nearby streets and roadways (NO neighborhood streetlights, sidewalks, bike lanes, roadside shoulders, etc.).

a) How will the air pollution be avoided?
b) How will the yearly flooding be contained and/or controlled without having negative impacts on nearby neighborhoods?
c) How will the water pollution/contaminated wells in nearby neighborhoods be avoided?
d) How will the failure of existing septic systems be avoided?
e) How will the fog be eliminated?

2) This development will have significant adverse effects on principal drinking water aquifers, prime farmlands, wetlands, flood plains, and ecologically significant areas.

- This development will be located directly over a "recharge" area necessary for the absorption of rain water to replenish the principal drinking water aquifer in this area. The creation of an impervious surface (paving over) will prohibit water absorption and cause displacement of millions of gallons of water, resulting in massive residential and environmental flooding.
- Water for drinking that is absorbed will be subjected to contamination from vehicle run off, construction materials, and both raw and treated sewage generated by the development and nearby residential septic systems.
- The property that is under consideration for this development is currently protected under The Williamson Act, is a designated community separator according to the

Sonoma County General Plan, and provides the community with both open space, and grazing land for nearby dairies.

- This property is at the head of the Laguna de Santa Rosa, "the largest freshwater wetland complex in coastal Northern California" (www.lagunafoundation.org). The Laguna is comprised of wetlands, vernal pools, riparian forest, oak woodlands, grasslands, and is home to and within the establish range of five federally recognized endangered species: The California Tiger Salamander, Sebastopol Meadowfoam, Burke's Goldfields, Sonoma Sunshine, and Showy Indian Clover. The Laguna is also an important stopover for thousands of birds migrating along the Pacific Flyway, providing a much needed source of food and rest. This property serves as an "overflow" area during the flood season.

a) How will the loss of this "water recharge" area be prevented?
b) How will the contamination of drinking water be prevented?
c) How will the loss of open space be prevented?
d) How will the loss of designated community separators be prevented?
e) How will the loss of grazing lands needed to support local agricultural enterprises, be prevented?
f) How will the loss of endangered species habitat be prevented?
g) How will the loss of wetlands be prevented?
h) How will the Pacific Flyway be re-routed?
i)Where will the floodwaters be directed to without causing major property damage and health hazards to nearby neighborhoods?

3,4,5,& 6) The significant environmental impacts of this proposed development on this particular site will have potentially catastrophic effects on wildlife, habitat, breeding grounds, water supply, and public safety for years to come.

- Property is located in a federally recognized flood plain. During the rainy season, this land is under 12 to 24 inches of floodwater (see enclosed photos). The "flood control" channel fills to capacity and overflows it's banks within a matter of hours every year.
- Sections of many roads are under water and closed to through traffic in nearby neighborhoods during the wet weather season.
- Development in this designated community separator will almost certainly set a precedent and lead to further development, thus eliminating open space and endangered species habitat. Development will lead to additional floodwater displacement, and exacerbate residential and environmental flooding.

a) Where to and how will the floodwaters be diverted?
b) Will the roads in ALL affected neighborhoods near this proposed casino site be re-built to accommodate the additional flooding?
c) How will the open space be preserved?
d) How will the designated community separator be preserved?
e) How will the Sonoma County General Plan not be violated?

f) How will endangered species habitat be preserved?
g) Will nearby homeowners be compensated by the tribe for wells gone dry, contaminated wells, and property damage due to flooding, traffic accidents, etc.?

7) N/A

8) This proposal/development will have adverse effects on endangered species and their habitats:

- California Tiger Salamander
- Sebastopol Meadowfoam
- Burke's Goldfields
- Sonoma Sunshine
- Showy Indian Clover

9) I would suggest that this proposal/development will have material adverse effects on resources requiring compliance with Executive Order 11988 (Flood plain Management). (See above).

10) This proposal/development threatens to violate Federal, State, and local laws imposed for the protection of the environment.

- Property located in a federally recognized flood plain.
- Property located in aquifer "recharge" area.
- Property located in a designated community separator.
- Property located at the head of the Laguna de Santa Rosa. Adverse environmental effects (pollution) will flow through several communities, wildlife habitats, and other environmentally sensitive locations all the way to the Pacific Ocean.
- Property is home to five federally recognized endangered species.

ALTERNATIVE SITE:

It is my feeling that this proposed development would be better suited to a property known as Skagg's Island.

Skagg's Island is located within the Graton Rancheria Tribe's aboriginal territory in Sonoma County. The island consists of approximately 3,300 acres, with 60 acres already developed as a Naval base. The base has long been abandoned, and the U. S. Navy has expressed a desire to turn this property over to the U. S. Fish and Wildlife Service. This property is located off of Highway 37, a direct route to major metropolitan areas close by

which would provide easy accessibility for the tribe's casino patrons. With the existence of the Naval base, the necessary infrastructure to support the tribe's development is already in place. There would be no need for major road improvements, no loss of residential dwellings, no construction in a flood plain, no loss of wildlife habitat, no compromising of public safety, water/air quality, no loss of open space, etc. This property at Skagg's Island is large enough to provide the tribe with several hundred acres of land for their use, as well as saving the remainder of land for environmental preservation, if desired. Skagg's Island is indeed an economically viable location for this development.

NEPA COMPLIANCE CHECKLIST

Expires 03/31/2004

State: **Federal Financial Assistance Grant/Agreement/Amendment Number:**

Grant/Project Name:

This proposal ☐ is; ☐ is not **completely covered by categorical exclusion No(s). _____, 516 DM 6 Appendix 1.**
(check (✓) one) (Review proposed activities. An appropriate categorical exclusion must be identified before completing the remainder of the Checklist. If a categorical exclusion cannot be identified, or the proposal cannot meet the qualifying criteria in the categorical exclusion, an EA must be prepared.)

Exceptions:
Will This Proposal *(check (✓) yes or no for each item below)*:

Yes	No		
☐	☐	1.	Have significant adverse effects on public health or safety.
☐	☐	2.	Have adverse effects on such unique geographic characteristics as historic or cultural resources, park, recreation or refuge lands, wilderness areas, wild or scenic rivers, sole or principal drinking water aquifers, prime farmlands, wetlands, floodplains, or ecologically significant or critical areas, including those listed on the Department's National Register of Natural Landmarks.
☐	☐	3.	Have highly controversial environmental effects.
☐	☐	4.	Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.
☐	☐	5.	Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.
☐	☐	6.	Be directly related to other actions with individually insignificant, but cumulatively significant environmental effects.
☐	☐	7.	Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places.
☐	☐	8.	Have adverse effects on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have adverse effects on designated Critical Habitat for these species.
☐	☐	9.	Have material adverse effects on resources requiring compliance with Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act.
☐	☐	10.	Threaten to violate a Federal, State, local or tribal law or requirement imposed for the protection of the environment.

(If any of the above exceptions receive a "Yes" check (✓), an EA must be prepared.)

Concurrences/Approvals:
Project Leader: _____ Date: _____

State Authority Concurrence: _____ Date: _____
(with financial assistance signature authority, if applicable)

Within the spirit and intent of the Council of Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA) and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record and have determined that the grant/agreement/amendment:

☐ **is a categorical exclusion as provided by 516 DM 6, Appendix 1. No further NEPA documentation will therefore be made.**
☐ **is not completely covered by the categorical exclusion as provided by 516 DM 6, Appendix 1. An EA must be prepared.**
☐ **includes other attached information supporting the Checklist.**

Service signature approval:

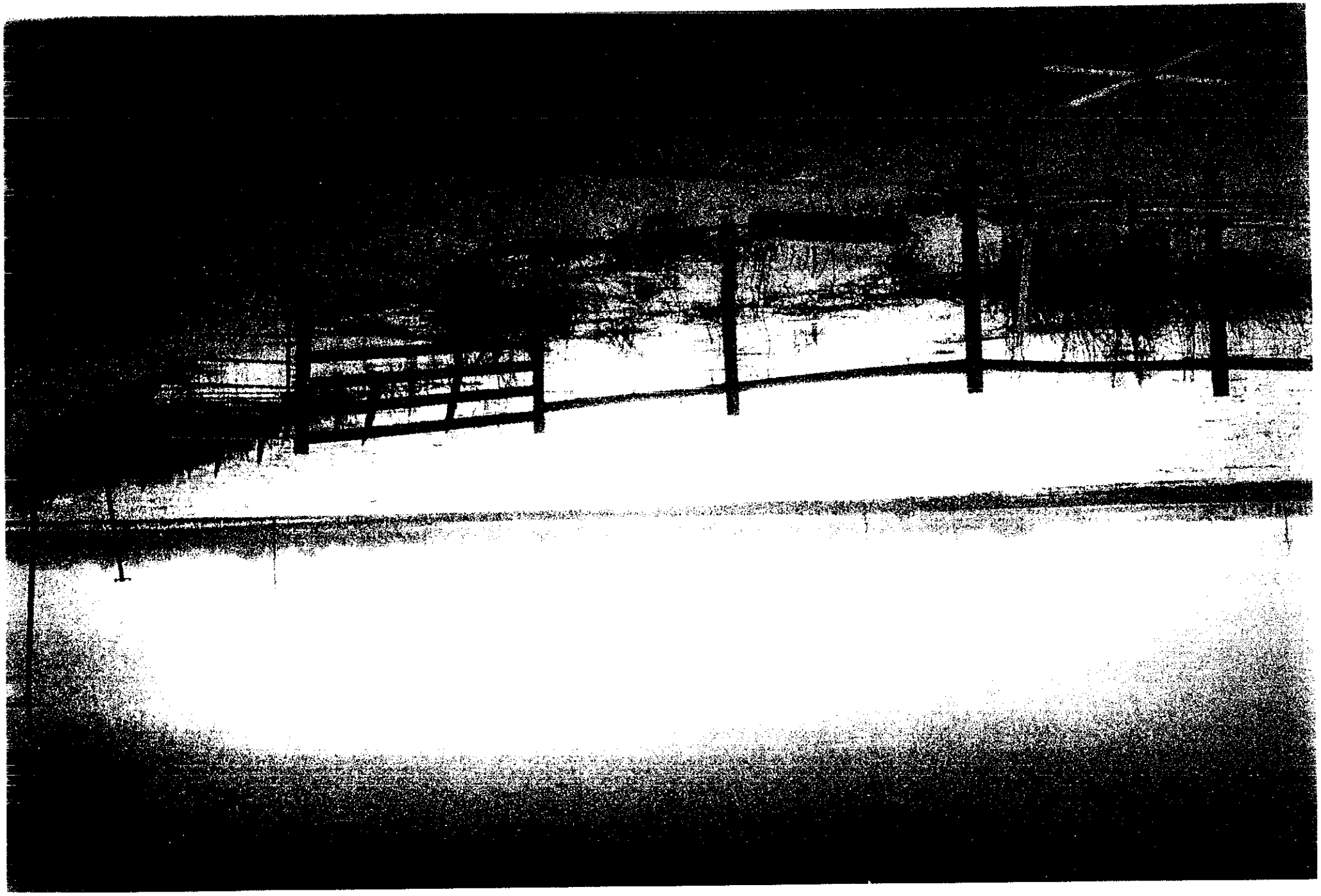
RO or WO Environmental Coordinator: _____ Date: _____

Staff Specialist, Division of Federal Aid: _____ Date: _____
(or authorized Service representative with financial assistance signature authority)

FWS Form 3-2185
08/00

Proposed Casino Site

Graton Rancheria



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RECEIVED
MAR 10 2004
National Indian Gaming Commission
Regional Sacramento, CA

I need to share my concerns for my town of Rohnert Park, that has to with the outcome of a beautiful town into a horrible nightmare. Please take note of what is about to happen. A town of familes and seniors who have earned the right to enjoy life and park where traffic is bad but still under control.. The worst traffic in history is about to explode on us as the struggle for a casino is coming upon us and the worst environmental traffic jam that any of us can really forsee will be a reality. Please look ahead by looking back on other projects that have turned out devastating. The impact of long,long hours of commuting with overheated cars and heated up drivers ready to do and act upon others who are as weary as they are. The list goes on. Water: can you see the impact on this hot commodity. You can't buy water if there is none. The whole impact of this casino is not worth the cost and the uglyness of what will happen. This is my first letter ever that I have written and typed so please excuse the mistakes but the biggest mistake you will make is that putting money first and enviroment last has all the marking for a disaster. We the people will be held hostage to come and go freely. It will affect all of Sonoma. Most of the people of Rohnert Park , Consider the land where Las Vegas wants to build a

casino out rainforest, so to speak Please accept this letter with my heart and the heart of the people of Rohnert Park out beautiful town in beautiful Sonoma County.

Thank you and please ~~lik~~ look ahead to see what is to come,and to come to surrounding towns. May I pray that the love of money does not forever damage out enviroment in Rohnert Park.

3/10/04

Thank you
Megna Marie Marenco

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RECEIVED
NATIONAL INDIAN GAMING COMMISSION
2004 MAR 26 PM 4:16

March 12, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005

RE: DEIS SCOPING COMENTS, GRATON RANCHERIA CASINO PROJECT

Hello,

I am a resident next to the property the Graton Rancheria is asking to be taken into trust. You have probably seen the site yourself, or possibly just some photos of it. It probably just looks like a big hay field, nothing special. However, nothing could be farther from the truth. Aside from being an environmentally sensitive area for lots of Wildlife, there are several important human factors involved.

This site is in the Sonoma County General Plan as a community separator between Urban Rohnert Park and the rural county area. It is also part of the California Land Conservation Act of 1965 (Williamson Act). There is a good-sized rural community surrounding the site. We all will be affected by the water problems, crime, traffic, noise, lights, concerts and other loss of quality of life a project of this scope will bring to our community.

The site is in the 100-year flood plain. The rural area surrounding the site does not have a sophisticated sewage/drainage system. We have deep ditches that carry the rain run off to the Laguna De Santa Rosa waterways and to this site. Our ditches have water in them until June, at least. Station Casinos/Graton Rancheria has said that they would ""mitigate" this problem, however I don't see how they can unless they want to revamp the entire area for miles around. The proposed site is needed for drainage. There is so much water on this site and surrounding area that several times a winter the roads around it are closed due to flooding.

WHAT WILL BE DONE TO ENSURE WATER RECHARGE?

This site is open space for a very necessary reason. WATER. Rainwater and other winter water drainage fills up the underground aquifer, which is underneath the proposed site. This basin supplies the water not just for the people on wells in the rural community, but also for the City of Rohnert Park.

WILL MOST OF THE SITE BE LEFT AS IT IS SO WATER CAN RECHARGE?
WHAT PRACTICES WILL BE USED TO PROMOTE WISE AND ENVIRONMENTALLY SENSITIVE USE OF THIS LAND?

The Santa Rosa basin recharges by natural percolation. If this site is developed and covered by buildings, streets and other non-permeable surfaces, natural basin replenishment can't occur.

WILL THERE BE WATER REGULATIONS FOR THE GRATON RANCHERIA?

The O.W.L. foundation (Open Space, Water Resource Protection, Land Use) studies have shown there is a serious problem with overdraft in the Santa Rosa basin. More water is being used than can be replenished. This underground aquifer has been depleted faster than it can refill due to growth in Rohnert Park. The city of Rohnert Park is pumping at least two times more than the recharge rate.

Even the County of Sonoma Permit & Resource Management Dept. has acknowledged that there is a serious ground water overdraft problem. (This was in 2002).

WHAT WILL BE DONE TO ENSURE THERE IS WATER FOR ALL?

The Rancheria wants to sink several 1000-2000 foot wells to supply water to the thousands and thousands of people that are predicted to come there daily. These wells are capable of pumping 2700-3500 gallons a minute. What will be done to ensure that there is water for everyone in the county that uses this supply?

People coming to the casino aren't going to ration water. A 300 room resort and a 2000 seat amplitheater, not to mention all the people that come just to gamble will use an incredible about of water. Not to mention all the water needed for landscaping the place.

TRAFFIC

WHAT WILL BE DONE TO DISCOURAGE THE USE OF NEIGHBORHOOD STREETS?

Currently, the heavily traveled roads are Stony Point and Rohnert Park Expressway. The side streets are all lightly traveled. If the proposed project goes in, our quiet residential streets will become dangerous especially on the dense foggy nights. There isn't any street lighting out here. Can you image 2000 people leaving a concert on a foggy night? All looking for a quicker way out of the traffic jam and coming down the unlit streets.

NOISE

WHAT WILL BE DONE TO REDUCE THE IMPACTS OF LIGHTS AND NOISE?

CRIME

Another concern is the increased crime. FBI statistics have shown that crime increases in areas around casinos! Our neighborhoods now are safe with rarely

any crime. We don't have any suspicious people wandering through checking out our homes. Shouldn't we be able to feel safe in our own homes? And not have to come home and find we've been burglarized?

ALTERNATIVE SITES

I don't know if the Graton Rancheria has looked at this spot, but there is 160 acres in Petaluma for sale. This land has scenic river frontage and has been on the market for a very long time. This property has direct HWY 101 access. Being right on the river would be a scenic location for a resort. The location of this property is Kastania Road & HWY 101 in Petaluma.

CLOSING

It is respectfully requested that the Graton Rancheria/Station Casinos be required to submit to the same environmental criteria and development scrutiny that any other development project is subjected to. A full NEPA environmental impact report and CEQA review would show that the proposed site is not a good location for this huge project.

I realize the Graton Rancheria has the right to have property taken into trust. I am just hoping you will consider all factors. If you do take this site into trust, is it possible to not allow a project of the scope they are asking for? Possibly just a casino? Not having a resort and huge amplitheater would cut down on the environmental impacts. I.E., water for our wells and our need to have this area for water recharging.

Sincerely,

Lisa Waite

Lisa Waite
4327 Primrose Avenue
Santa Rosa, CA 95407

March 10, 2004

Debbie K. Clarkson
510 Corte Naranja
Rohnert Park, Ca.
94928
707-585-0912

RECEIVED
MAR 10 2004
National Indian Gaming Commission
Region II, Sacramento, CA

Christeana Nagel
NEPA Coordinator
National Indian Gaming Commission
9th Floor
1441 L St. NW
Washington, DC 20005
202-632-7003

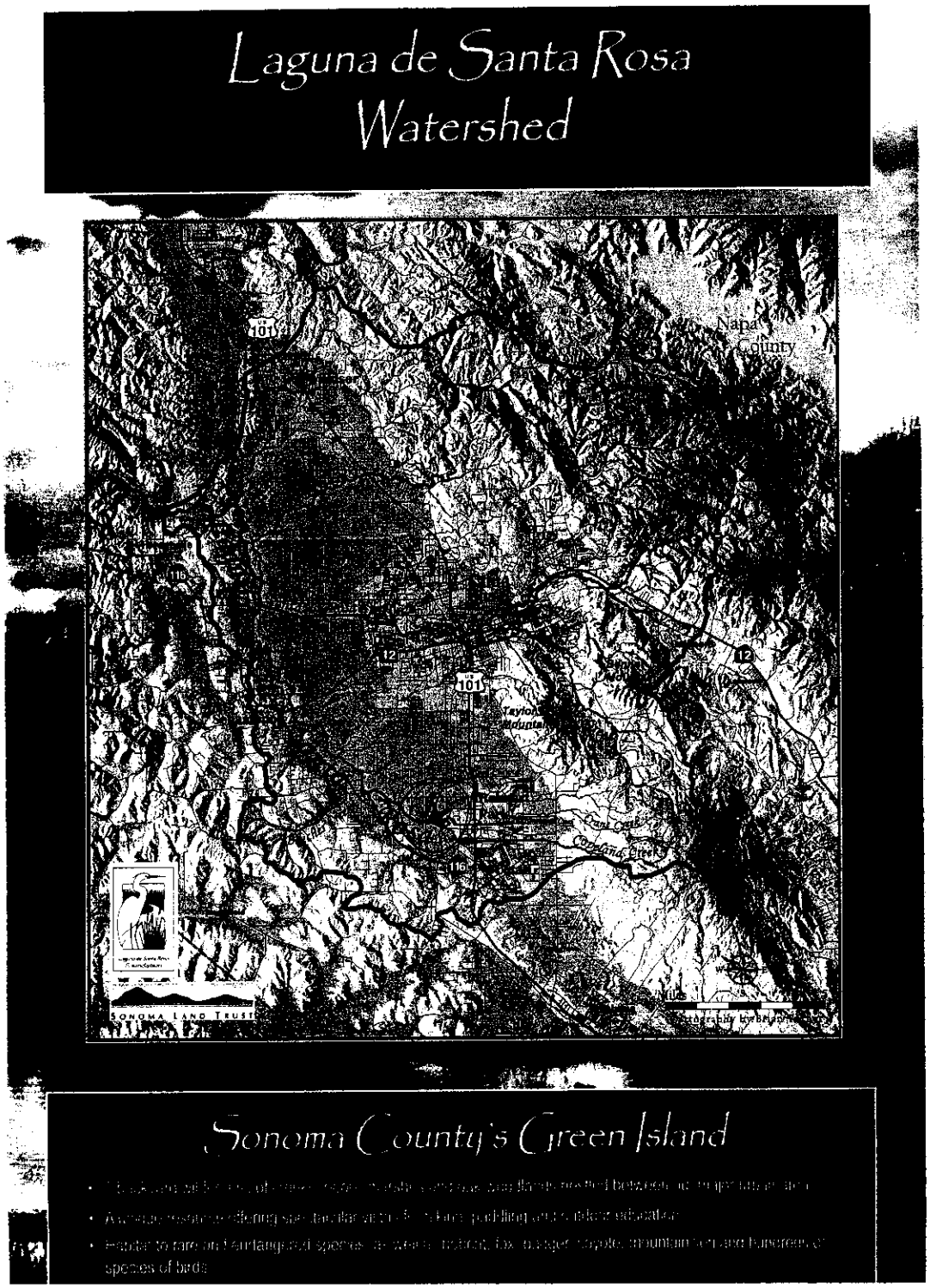
Dear NEPA Coordinator

I live in the Rancho Verde Mobile Park, Rohnert Park, Ca. We are the closest neighbors to Graton Rancherias proposed casino in Sonoma County.

In doing your environmental review please answer me & carefully consider the following:

1. How can land the is zoned as a community separator & open space be purchased for

a Casino? It is also zoned low density, ag land. It is on flood plain. It is the beginning of the Laguna De Santa Rosa. It is partially protected by the Williamson act. It is home many kinds of wildlife. Please see the pictures I have included. They tell this area's needs and my concerns better than I can.



The X marks the proposed Casino Site.

Looking North Bellevue - Wilfred Flood Channel
after about 1½" to 2" of rain in Jan. 2004
Notice all the pooled standing water to the right.

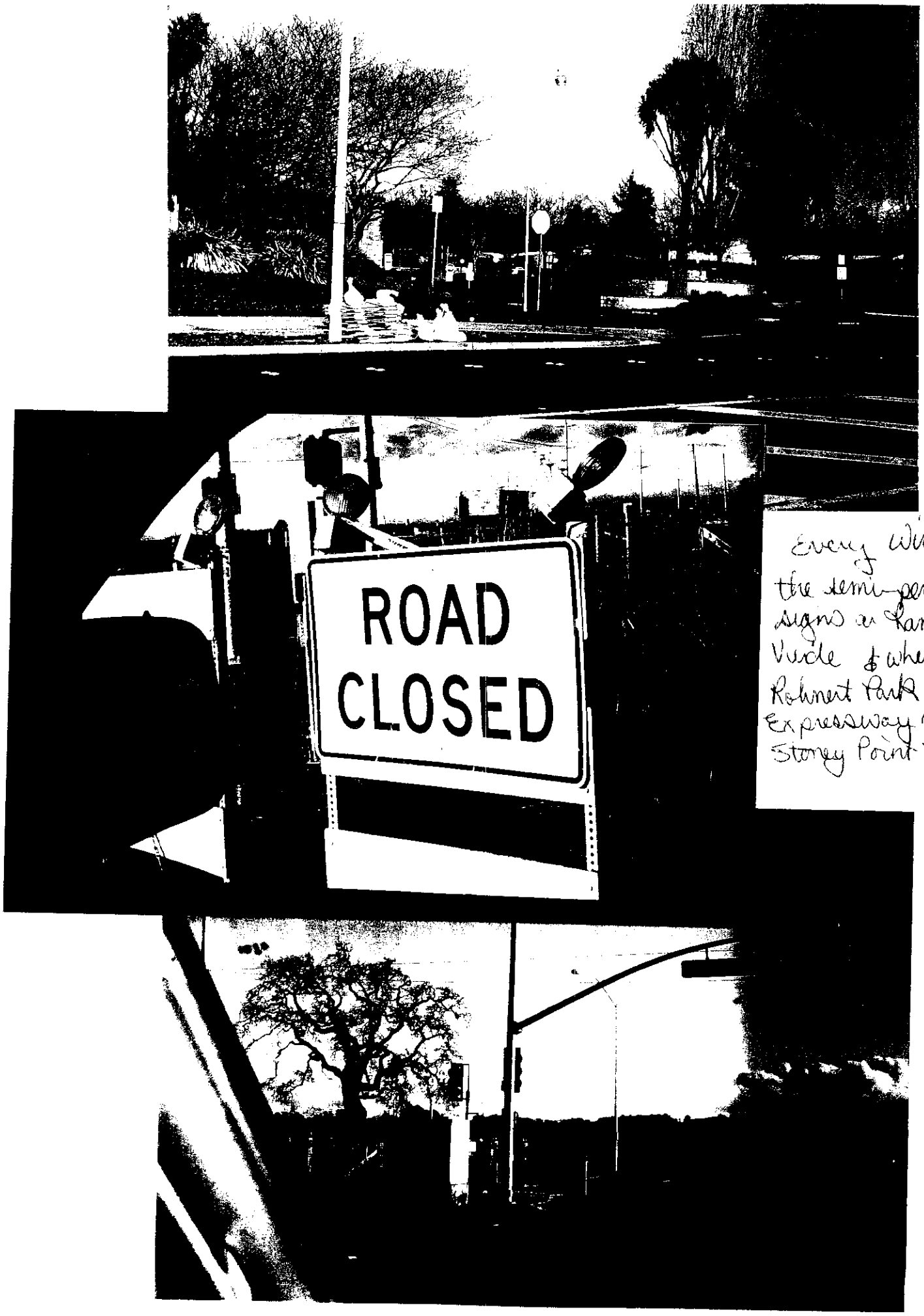
Looking South from Wilfred Ave.
Where will this Water going to Go? The Displaced water from the field has to go somewhere.

on P.P. Exway looking North at Standing Water. In March 2004.

Primrose Ave Between Wilfred &

Scenic
ly fill is brought in for the Casino
will the water now enter houses? Or will our
[illegible] water [illegible] higher?

P.5.



Every winter the semi-permanent signs on Rancho Verde & where Rohnert Park Expressway meets Stoney Point Rd.

What will happen to the homes on Reopple who live on Wilfred Ave when it is widened to 4 or 6 lanes for access to the Casino?

The Laguna De Santa Rosa Basin, looking South From Rohnert Park Expressway

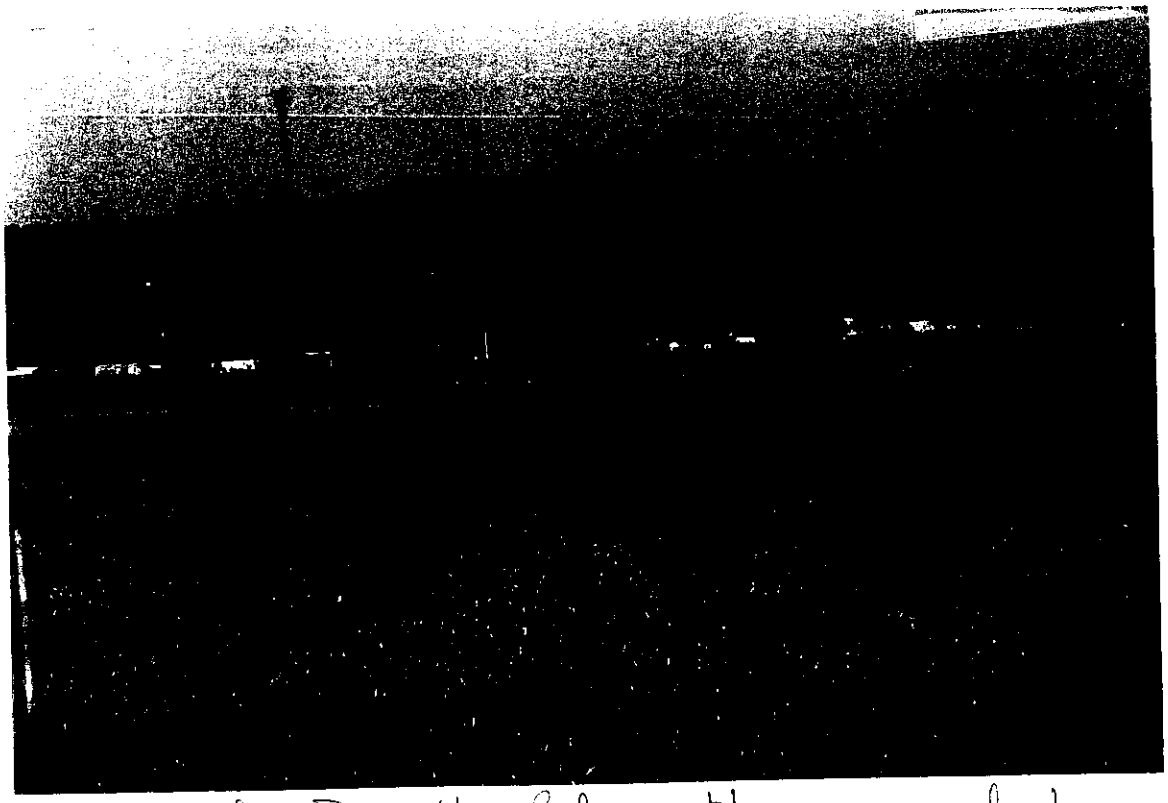
March 2004
Still Standing Water

Blue Heron

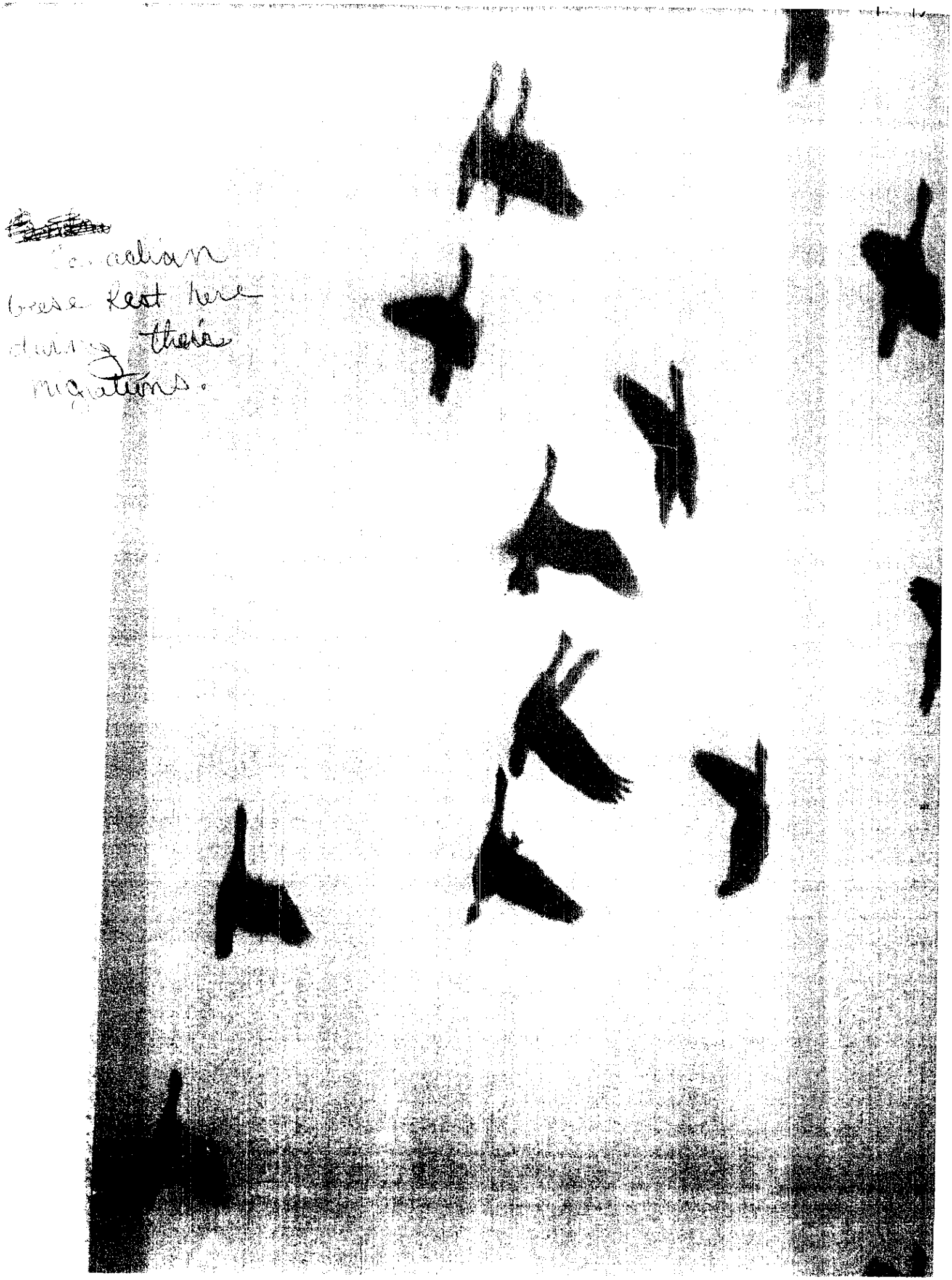
Mustard in the Open Space. Much Better than a Casino!

Many egrets hunt out here

Sept. 2003



March 2004 Blue Heron. I have also seen Pheasants, Owls, Ducks, Muskrats, Turtles, & Salamanders out here. Where will they all go?



[illegible] Canadian
geese. Rest here
during their
migrations.

P. 10.

Good Use of this open space other than a preserve or Park.

What will happen to the Dianjing Families?

Rancho Verde Flood Views
Will felt now come in our Homes?

My front covered with water.

solid water with floating lid.
when water is this high on our Court, it is much higher on Verde Circle

Rancho Verde streets flood

This was the scene at Rancho Verde Mobile Home Park Thursday morning as floods inundated Rohnert Park. The park is usually the first place in town to flood, but the homes are elevated high enough that residents are able to stay relatively dry. Other areas closed by flooding included Petaluma Hill Road at various intersections, Redwood Drive at Hinebaugh Creek, Martin and Labath Avenues, and Snyder Lane at Mountain View Avenue. (Photo by Bob Browne)

By Jud Snyder
COMMUNITY VOICE EDITOR

Thursday's rain and windstorm ripped through Rohnert Park and Cotati with fierce gusts and horizontal rain slashing across the cities about 11 a.m. leaving broken tree limbs and clogged street drains in its wake.

"We had several severe storm cells Thursday morning," said Bill Stephens, RP director of public works. "But the one at about 11 o'clock was the strongest."

Sycamore trees in Alicia Park adjacent to John Reed School took the brunt of the damage. One limb crushed a picnic bench near the tot playground which, itself, was inches deep in water. Public works crew were out in force cleaning a flooded Santa Alicia lobbe and sawing tree trunks and limbs from fallen trees to feed in to the chipper.

"People are still picking up sandbags," said Stephens. "Just before your call a truck drove up with another load of sand. We're looking for a few hours of relatively dry weather and then more rain this weekend."

"We feel pretty lucky," Stephens added. "We don't have major damage or flooding like so many other communities are getting. Just a lot of minor flooding episodes all over town."

February's weather pattern is on its way to set new records. Month's total as of February 18 is 6.79 inches, according to *Voice* weatherman Glenn Hildebrant. Total rainfall to date is 41.25 inches, almost 14 inches above last year's total as of this date. Normal rainfall is 22.30 inches. Details in the weather graph below.

WEATHER FACTS

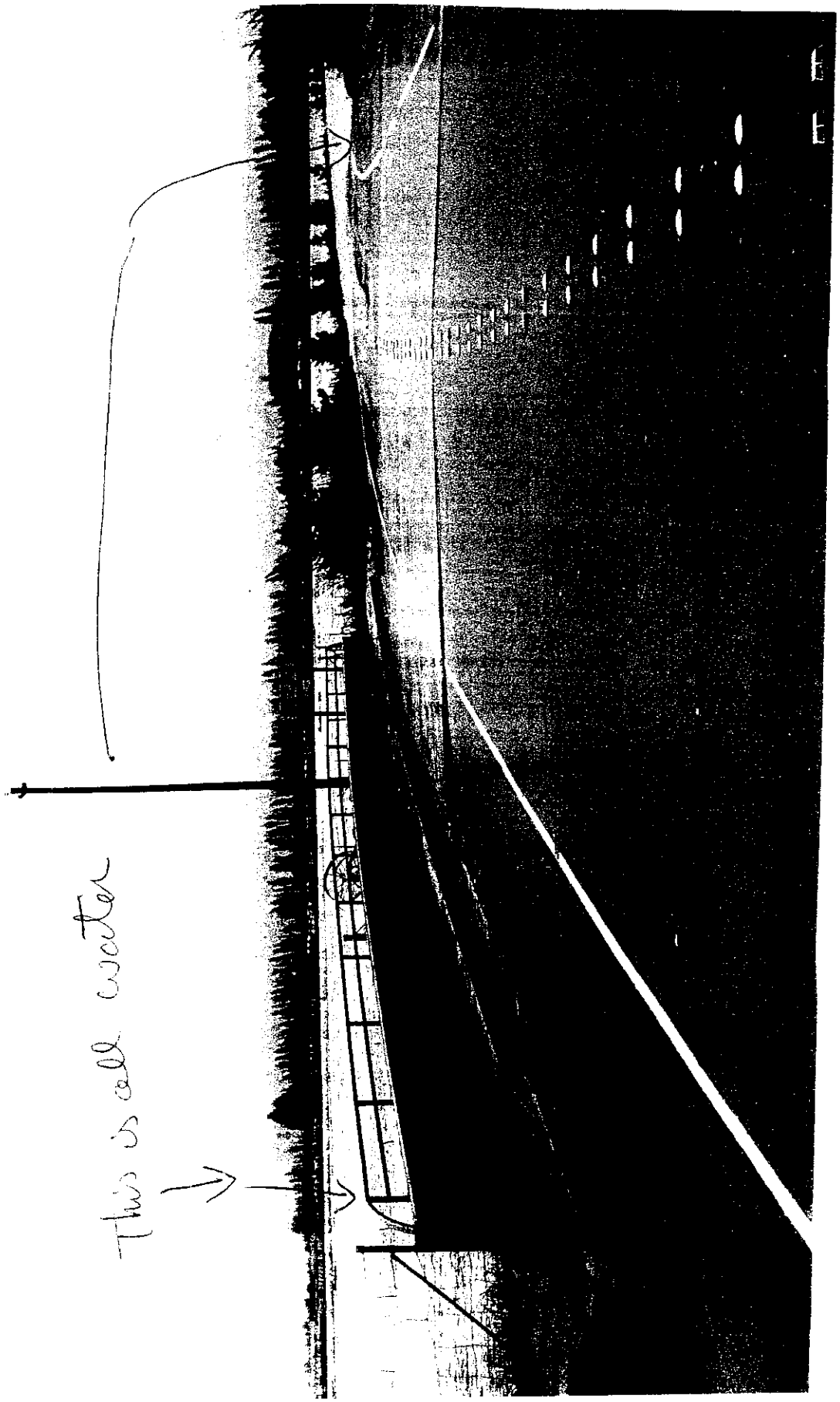
		Low	High	Rain
[illegible]	[illegible]	38	54	.43
[illegible]	[illegible]	47	63	T
[illegible]	[illegible]	40	60	1.30
Sun	2/15	39	63	.13
Mon	2/16	36	51	1.00
Tues	2/17	39	58	.50
Wed	2/18	39	61	–

Rainfall to date 41.25"
Last year to date 27.69"
Normal to date 22.30"
(Measurements recorded daily at 5pm)

Pl. B.

Looking out from 119 Verde Circle in Rancho Verde towards proposed site.

Looking Northward & somewhat East from Rancho Verde at the Bellbrook - Wilfred Flood Channel. The proposed site & Rohnert Park Expressway disappearing into Water.



Hopefully these Pictures will tell you many of my Concerns. Please address them.

I am not against a Casino. Just don't put it on this semi-protected site. I admire the Tribe and their culture. So much so, that for the last three years I have been learning how to weave Pomo & Miwok Baskets.

In addition to the flooding of my streets and the surrounding areas I have concerns about the increased traffic & noise. How can increased traffic & noise levels from a Casino not make our quality of life decrease? This is multi family Park of over a 1,000 residents with many children & elders. The Kids walk and ride their bikes from our Park into town. It is so quiet at night we can hear the nearby Owls hunting & cows in nearby fields from a mile away. Noise carries so far at night, how can a noisy Casino be allowed in a residential-semi rural area?

Thank you for taking the time to address my questions & concerns. I look forward to your replies soon.

Sincerely yours

Nikki K. Clarkson

Mary P Zaft
5325 Eunice Street
Rohnert Park, CA 94928
March 6, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, 9th Floor
Washington, DC 20005

"DEIS Scoping Comments, Graton Rancheria Casino Project"

Dear Ms. Nagle:

I am contacting you because I have deep concerns about the resort gaming project proposed for the Rohnert Park area in Sonoma County. Please let me begin with the following community impact of traffic.

Route 101 in Rohnert Park

The Graton Rancheria casino/hotel resort entrance will be one- half mile from the freeway at Wilfred Avenue. The community is already experiencing traffic congestion on the freeway at all points in Rohnert Park north and south. Commute traffic is bumper to bumper on Fridays and heavy during the rest of the week. This includes the off ramps at Rohnert Park Expressway and Wilfred Avenue. Another entrance is planned on the Rohnert Park Expressway within one half mile of a mobile home park.
Based on the enormous size of the proposed complex the daily trip generation will exceed 15,500 average trips per day to the complex. Aside from cars there will be additional construction equipment, tour buses, and delivery trucks to the site. How difficult will it become for residents to travel on highway 101 with the expected large flow of vehicles to the casino? The hotel casino is on track to be completed in two to three years. I am concerned about the traffic issues at the time of the construction and opening of the casino /resort complex.

According to the Sonoma County Transportation Authority 2010 Construction Strategy:

Rohnert Park Expressway to Wilfred Avenue Highway improvement is fully funded with 47.8 million. Construction is anticipated to begin in 2006. Construction may be delayed due to state budget cuts.

Old Redwood Highway to Rohnert Park Expressway still needs 90million for its anticipated construction start.

Rohnert Park is not alone in the Highway Improvement needs. Nearby Santa Rosa has two highway projects planned for it. Funding is still needed for one of the projects. Again, all depends on the state budget for transportation which the legislature borrows from and puts into the general fund. The legislature is not under any legal obligation to pay the funds back.
What guarantees do we have that freeway improvement can be made as needed? It appears the casino resort will be operational well before freeway improvement even begins at earliest in 2007. The casino resort will attract people from the San Francisco Metropolitan and Bay Areas. This will be the largest and closest casino for people in those areas to come visit. This brings me to my next concern.

Marin Sonoma Narrows

The California Department of Transportation writes," ....Bay Area residents see almost everyday, that U.S. Route 101 in Marin and Sonoma Counties experiences recurring traffic congestion. The Narrows project proposes freeway improvements to the US Route 101 corridor. The project will be constructed in phases running 17-miles in length which includes the narrowed freeway portion of the RT. 101 between Novato to Old Redwood Highway in Petaluma." The multi lanes in Novato merge to two lanes all the way to Rohnert Park. This is the main artery to Sonoma County. This project has been formulated over many years. It is intended to connect up with the Rohnert Park Expressway and Wilfred Avenue segments.
The Narrows project cost is estimated at $450 million dollars and 400million in construction funding is still needed.

I have concerns about the county roads that will be surrounding the casino resort:

Stoney Point Road

This road runs parallel to Rt. 101 and is one and one half mile west of the freeway. It is already a heavily traveled roadway from Petaluma to Santa Rosa. The nightly commute is slow past Rohnert Park Expressway to Todd Road in Santa Rosa. It is bumper to bumper congestion on Friday evenings. Residents tell me they must wait up to ten minutes at times to pull out of their driveways onto Stoney Point Road. It is obvious there will be an increase of traffic with two of casino entrances right off this road on Rohnert Park Expressway and Wilfred Avenues.

Rohnert Park Expressway

Many businesses are along the western portion of this Expressway and a mobile home park will be right next door to the casino resort. Increase traffic can be expected as one of the entrances will be on this roadway.

There are two other roads (country roads) that connect off of Stoney Point Road and connect up with the freeway to the east.

Wilfred Avenue

One of the casino entrances will be on this narrow country road about one –half mile west of the freeway. This old narrow road is used by the residents that live along this lane. This is their only connector to town. This lane cannot accommodate the expected traffic volume of buses, delivery trucks, employee vehicles and visitors to the complex. On rare occasion I have driven down this road. It is terrifying to me when I see another car heading towards me. If you veer off by a few inches you can end up in a ditch or be hit. I have seen bicyclists go off into the ditches here. The casino complex will be open twenty four hours a day seven days a week. What about all the vehicle emission odors? What about increased noise levels? What about tired or drunk drivers speeding in the fog or driving into the water runoff trenches along the roadway (on both sides of road) as they leave the casino? What about the flooding this road is prone to in the winter? Let me add the R.P. Expressway is also prone to flooding. What about tire rubber, increased vehicle oil and diesel residue being washed off into the Laguna De Santa Rosa during the wet months?

Millbrae Avenue

What will become of this old country road? This narrow road intersects the Sonoma County community separator. It runs parallel to Wilfred Avenue one-half mile away. I can drive from Stoney Point Road in the country to the city of Rohnert Park in less than 3 minutes and view rural homes, barns and open space. It's difficult for me to make a logical argument at this point. I will miss this aesthetic urban boundary if the casino resort is built. I am concerned about increased traffic here as people will use Millbrae to avoid casino traffic. The same concerns I previously brought up for Wilfred Avenue exist here also.

Traffic mitigation will have to happen here on these aforementioned roadways. What traffic issues I've mentioned here will be eliminated by the road improvements? How will the noise be affected? How will this stop runoff of vehicle chemical residues into the Laguna De Santa Rosa?
How will the residents living along Wilfred and Millbrae Avenues be affected with a widened roadway? Will they lose their homes? Will they lose portions of their land? How will their children be affected by the increased traffic and roadway construction?

The casino resort plan appears to have road improvement construction projects in mind to mitigate traffic issues. I have concerns about the funding that will be needed by Caltrans and the costs to the County of Sonoma. With State and Federal Budget short falls, funding will likely be delayed for a majority of road improvement projects. I have an attachment to document the concerns of less than expected funding to state transportation agencies. Caltrans does not have enough funding at this time. As I understand the Federated Indians of Graton Rancheria is offering to contribute to the costs of traffic mitigation. The tribe has agreed in the

MOU with the city of Rohnert Park to contribute $15 million plus dollars over a twenty year period towards four road construction projects:

- **to help with the Wilfred Avenue/ Golf Course Drive interchange**
- **A portion towards costs to connect State Farm Drive and Business Park Drive to help ease congestion at neighboring interchanges.**
- **Widen and improve a one-mile stretch of Rohnert Park Expressway from Rancho Verde Mobile Home Park to Stoney Point Road.**
- **Traffic signals at intersections impacted by the project.**

As I mentioned the Wilfred Interchange is fully funded now so long as the State budget deficit does not delay the project. The State Farm Drive and Business Park Drive is another construction project to add to the list. The portion of Rohnert Park Expressway to be widened affects the immediate casino- hotel complex area. How many traffic lights will be placed in Rohnert Park? Where will the signals be placed? We sit at so many traffic signals on both sides of the freeway now.

What about the other proposed construction needs?

Caltrans does not have monies to fund all the needed transportation improvement projects. There is a short fall of $580 million dollars to fund the six Rt 101 projects needed now in Sonoma County. Caltrans is meeting with the Graton Rancheria to see what needs to be done to keep traffic flowing on Rt. 101. At the same time Caltrans is negotiating with six other Indian gaming sites across the state. Caltrans would like funding from Native American Federal Grant monies. How are the negotiations going at this time? Even if this happens the monies will provide a small portion towards the costs. What is the dollar amount of this grant money?
The County will have costs for the road improvements necessary on the surrounding off-reservation roads I previously mentioned. Sonoma County has seen its share for state subsidies for transportation projects down to less than 5% of expectations. Transportation costs may be less in future years since the state does not have to pay back what they borrowed. The gaming tribes will make up the cost difference?

In San Diego County four tribes have offered to pay approximately $ 11 million dollars to the County towards $55million in road improvement costs. This does not include all the associated costs with the projects. This works out to a 20% fair share amount.

Since the local, state and federal budgets are experiencing funding deficits, I think it is imperative to know the state of all transportation funding available for anticipated traffic issues before the proposed casino resort complex moves forward.

In conclusion, I would ask if there is anyway an agricultural enterprise could be established at the proposed reservation site of the Federated Indians of the Graton Rancheria?

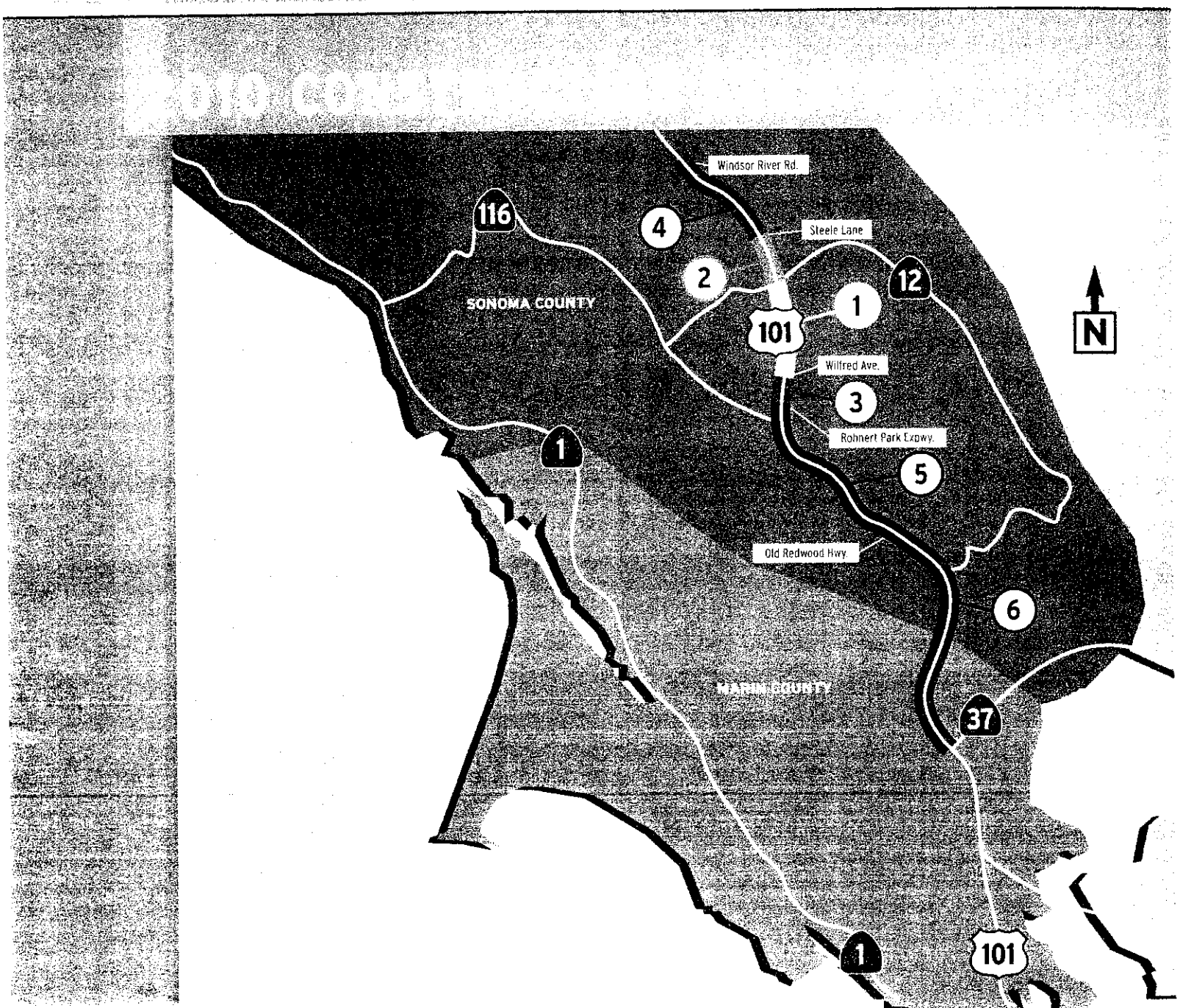
Thank you for your time to read my concerns. I look forward to hearing from you in regards to my questions.

Sincerely,

Mary P. Zaft

2 attachments enclosed

highway 101
WIDENING PROJECTS



Project #	Project Segment	Funding Status	Amount Funded	Funds Needed	Anticipated Construction Start
1	Wilfred to Hwy. 12	Constructed	$28.7	None	Constructed
2	Hwy. 12 to Steele Ln.	Funded	$77.5	None	2004 - 2005
3	RP Expwy. to Wilfred Ave.	Funded	$47.8	None	2006
4	Steele Ln. to Windsor River Rd.	Needs Const. Funding	$10.0	$90.0	2007
5	Old Redwood to RP Expwy.	Needs Const. Funding	$10.0	$90.0	2007
6	Marin/Sonoma Narrows	Needs Const. Funding	$50.8	$400.0	2007 - 2008
	TOTALS		$341.8	$580.0	

SCTA
Caltrans
FHWA

Highway 101 Widening Projects - 2010 Construction Strategy

The following projects are included in the 2010 Construction Strategy for Highway 101 in Sonoma County. These projects will improve traffic operations and provide continuous High Occupancy Vehicle (HOV) lanes between southern Marin County and Windsor in Sonoma County.

1 Wilfred Avenue to Highway 12: This project has been constructed and HOV lanes are open to traffic. Final work related to electrical items, sound walls, and landscaping is under way. The environmental document for this project can be found at: www.dot.ca.gov/dist4/sonoma101/SON101.html

2a Highway 12 to Steele Lane: This project will add HOV lanes in each direction, ramp improvements and auxiliary lanes will also be provided to encourage HOV use and improve mainline traffic operations. The project also includes new structures, structure replacement and improvements, sound wall construction and relocation, and modification to the surrounding local street network to improve local circulation and access. Environmental approval is anticipated in 2003, and construction is anticipated to begin in 2005. For more information on this project, visit: www.dot.ca.gov/dist4/route12wpg.htm.

2b Steele Lane Interchange Improvements: This project was originally combined with the Highway 12 to Steele Lane Project, but now has a separate schedule. The project will reconstruct the interchange and add HOV lanes. Environmental approval is anticipated in 2003, and construction is anticipated to begin in 2004.

3 Rohnert Park Expressway to Wilfred Avenue: This project will add HOV lanes in each direction, add auxiliary lanes between the Rohnert Park Expressway and Wilfred Avenue Interchanges, provide ramp improvements, construct one new and modify an existing park-and-ride lot, and modify the local street network to improve access and circulation. The environmental approval is anticipated in 2005, and construction is anticipated to begin in 2006. This project is fully funded, however, construction may be delayed if state budget cuts cause funding to be held back.

4 Steele Lane to Windsor River Road: This project will add HOV lanes in each direction, ramp improvements and auxiliary lanes will also be provided to encourage HOV use and improve mainline traffic operations. Environmental assessment begins in 2003, environmental approval is anticipated in 2005, and construction is anticipated to begin in 2007. This project is funded through the environmental and design phases. GARVEE bonds are anticipated to fund the construction phase.

5 Old Redwood Highway in Petaluma to Rohnert Park Expressway: This project will add HOV lanes in each direction, ramp improvements, auxiliary lanes between SR116-Gravenstein Highway and Rohnert Park Expressway if studies show they are needed, and a northbound climbing lane along Cotati Grade. Interchange improvements at Railroad Avenue are an option. Environmental assessment begins in 2003, environmental approval is anticipated in 2005, and construction is anticipated to begin in 2007. This project is funded through the environmental and design phases. GARVEE bonds are anticipated to fund the construction phase.

6 Marin/Sonoma Narrows: This project will add HOV lanes from Highway 37 in Novato to Old Redwood Highway in Petaluma, upgrade the "Novato Narrows" section to freeway, provide interchanges and frontage roads to replace at grade intersections and driveways, and make ramp improvements. The project will be constructed in phases. Initial construction phases would provide HOV lanes and ramp improvements between Highway 37 and Atherton Avenue in Novato, and between Highway 116 (East) - Lakeville Highway and Old Redwood Highway in Petaluma. This project is funded for environmental, engineering design and right-of-way work. An additional $400 million in construction funding is still needed. Environmental approval is anticipated in 2005-2006, and construction is anticipated to begin in 2007-2008. Given state funding issues, project delivery dates for this project may change. For more information on this project visit: www.dot.ca.gov/dist4/msn.

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Caltrans District 4

Current Caltrans Projects

These documents are saved in Adobe Acrobat format. Visit our page to download Acrobat Reader for free.

This page was last updated on October 2, 2003 by webmaster

723

Christine Nagle, NEPA Coordinator,
National Indian Gaming Commission,
1441 L. Street, NW 9th floor
Washington, DC 20005

DEIS Scoping Comments
Graton Rancheria Casino Project

Ms Nagle
The proposed project by the Graton Rancheria in Rohnert Park, California in the County of Sonoma, is an environmental disaster and will cause a series of problems.
The land is farmland that was set aside 25yrs. ago for open space.
It is on a floodplan. Already the sewers 5miles around the site overflow with heavy rains, every year.
The Project will pollute the Laguna de Santa Rosa.
The tribe stated at the meeting in Santa Rosa they will fix the problems.
The only way they can ,
is to build in a more compatible place, not here.
The whole area around the site floods every year. They close the roads.
I couldn't even get to the Cosco Store which is due East of the Project. EVERY road was closed. Ask the Highway Patrol.
Why on earth would they want to pick this place?
The site is home to 1 Endangered Species and 4 Endangered Plants.
The traffic in Sonoma County running thru Hwy 101 has DOUBLED in the past 10 yrs.! Stony Point Road and 101 are already jammed EVERY DAY, what maddness, it will be to add 24 hour traffic to and from a Casino and Hotel!
They will take water in an area ,thats water table is already falling, causing our wells to go dry.
I URGE you to consider all the serious environmental problems that this project will cause.
Jenny MCINTYRE
3510 Phillips Ave
Santa Rosa, CA 95407
DEIS Scoping Comments
Granton Rancheria Casino Project

723

Christine Nagle, NEPA Coordinator,
National Indian Gaming Commission,
1441 L. Street, NW 9th floor
Washington, DC 20005

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Jenny MCINTYRE
3510 Phillips Ave
Santa Rosa, CA 95407
DEIS Scoping Comments
Granton Rancheria Casino Project

Received 04-01-04 07:22pm From- To-2026327066 Page 001

72.

ALLAN S. HILL, M.D.

555 PETALUMA AVENUE, SUITE C
SEBASTOPOL, CALIFORNIA 95472

March 15, 2004

TO:
National Indian Gaming Commission
Attention: Christine Nagle, NEPA Coordinator
1441 L Street NW
9th Floor
Washington, D.C. 20005

RE: "DEIS Scoping Comments, Graton Rancheria Casino Project".

FROM:
Allan S. Hill, MD
555 Petaluma Avenue, Ste. C
Sebastopol, CA 95472

***PLEASE WITHHOLD MY NAME & ADRESS FROM PUBLIC REVIEW OR FROM DISCLOSURE UNDER THE FREEDOM OF INFORMATION ACT.**

Dear Ms. Nagle,

I am writing to you today because I oppose the "Rohnert Park" casino and entertainment center being currently proposed for construction in Sonoma County near Rohnert Park city limits. This is a development that would be done under the auspices of the Federated Indians of Graton Rancheria.

I am taking this time from my practice to write to you because I am tired. I am tired of being a California native that has seen our interests in preserving the balance between growth and the environment overshadowed by financial pressures. The issue with this development is not about Indian rights. What is happening here is that the Nevada gaming facilities are using the Indians to expand into the lucrative California market. While I think the Indians are due their full rights to develop their lands, I feel that in this case, the development will benefit the outside investors more than it will benefit the Indians for whom it is supposedly designed.

This large development is slated to cover up an area of relatively undisturbed wetlands. It will also place a strain on the ability of the county to provide fresh water at a time when our new sources of drinking water are limited. This proposed development is also different from other casino proposals in that it would occur in an area on the border between an urban and rural district contrary to the Sonoma County General Plan. This area currently faces traffic congestion and the casino would place high demands on already over taxed county and city infrastructures.

2004 MAR 30 AM 9:31

PHONE: (707) 829-8426
FAX: (707) 829-6675

REC
NATION AN
GAMING SION
2004 MAR AM 9: 30

TO:
National Indian Gaming Commission
Attention: Christine Nagle, NEPA Coordinator
1441 L Street NW
9th Floor
Washington, D.C. 20005

RE: "DEIS Scoping Comments, Graton Rancheria Casino Project".

FROM:
Elizabeth Perry
4517 Langner Avenue
Santa Rosa, CA 95407

*PLEASE WITHHOLD MY NAME & ADDRESS FROM PUBLIC REVIEW OR FROM DISLOSURE UNDER THE FREEDOM OF INFORMATION ACT.

Dear Ms. Nagle,

I am going to keep emotion out of this because I know you must be basing your study on facts. The facts are we have a serious groundwater issue. I live within a glance of the proposed casino site and am totally dependent on my well for water. If this casino is allowed to proceed with its expected 10,000 to 20,000 daily visitors including a 300 room hotel, I can tell you there is just not enough water to fulfill that kind of demand. My parents who live just five minutes away already have one dried up well. There is no city hook-up available for us. The facts of water shortage are well documented.

The second fact is that if 360 to 450 acres of land is paved over there will be a serious loss of water that can no longer recharge the groundwater supply. This water will simply be wasted. Also, this water will pose a serious flooding problem since it cannot penetrate asphalt. When Stony Point Road was recently widened just a short distance, it caused flooding problems for all its neighbors. What will become of our properties, septic systems and leach lines when all that run off water comes our way? The streets already flood as is. If a casino complex of this magnitude is built it will surely rise above all our property levels and cause flooding. We are not allowed by the county to bring in fill dirt to raise our property to any significant level that would help us from such a flood threat. We are all dependent on septic systems. There is no city sewer hook-up for us.

Lastly we have a serious traffic congestion fact. The traffic is so bad on Stony Point Road that they are proposing to widen another section that will destroy up to 25 families and their homes.

How many hundreds, thousands of people will have their lives disrupted and ruined by such a massive project like this casino that is obviously disrespectful of its neighbors,

environment and government? This is an established Greenbelt, Open Space District, Urban Boundary, General Plan and Agricultural region.

I realize you are powerless to enforce laws on a tribe which enjoys it's sovereign privileges and are essentially being used as a publicity stunt for the Las Vegas investors and the tribe that has been bedazzled by promises of a lucrative future but somehow I had to write anyway.

Thank you for your consideration.

Sincerely,

Elizabeth Perry
Affected Property Owner

Efrain A. Jovel
1430 Guerneville Rd E-5
Santa Rosa, CA 95403
(707) 545-7687

March 23, 2004

To whom it may concern:

I, Efrain A. Jovel, a Notary Public of the State of California, hereby declare that I have personally taken to the Postal Service a letter by Correy Alcantra, dated March 17, 2004; containing 7 pages; and Addressed to: Christine Nagle, NEPA Coordinator, National Indian Gaming Commission, 1441 L Street NW, 9th Floor, Washington DC, 20005.

If any information is needed, you may call me at the above number.

Sincerely,

Efrain A, Jovel, Notary Public

EFRAIN A. JOVEL
Commission # 1274058
Notary Public - California
Sonoma County
My Comm. Expires Sep 11, 2004

RECEIVED
NATIONAL INDIAN
GAMING COMMISSION
2004 MAR 30 PM 4:35

CHRISTINE NAGLE, NEPA COORDINATOR
NATIONAL INDIAN GAMING COMMISSION,
1441 L STREET, NW., 9TH FLOOR,
WASHIGHTON DC, 20005

DEIS SCOPING COMMENTS, GRATON RANCHERIA CASINO PROJECT

I AM A NATIVE AMERICAN. I AM WITH THE COYOTE VALLEY BAND OF POMO INDIANS. THIS IS MY MOTHERS TRIBE. MY FATHER WAS COAST MIWOK. HE COULD HAVE BEEN WITH THE FEDERATED INDIANS OF THE GRATON RANCHERIA. I WAS AT THE MARCH 10TH MEETING BUT I WAS PRESSED FOR TIME AND WAS UNABLE TO SPEAK. I WISH TO ENLIGHTEN YOU OF WHAT IS HAPPENING HERE AND WHATS AT STAKE. BECAUSE OF MY UNIQUE STATUS YOU MUST LISTEN TO WHAT I SAY. I'D LIKE TO ALSO STATE I HAVE MUCH EXPERIENCE IN TRIBAL GAMING AND POLITICS.

IN LATE MAY 2003 THE GRATON TRIBE ATTEMPTED TO GET LAND AT SEARS POINT NEAR SAN PABLO BAY. THIS PUT MANY GROUPS IN AN UPROAR. EVERYONE AGREED THIS WAS A BAD PLACE FOR A CASINO. THE GRATON TRIBES TRIBAL COUNCIL WENT TO PETALUMA, SANTA ROSA AND SONOMA TO PRESENT THEIR CASE. EACH TIME THEY DID THE SAME PRESENTATION. WHICH WAS THE TRIBAL CHAIRS SPECIALTY. THEY DID NOT ALLOW ANY QUESTIONS OR COMMENTS. THE TRIBAL COUNCIL SAID THEY PLANNED ONLY TO PUT 10 HOUSES ON THIS LAND. THAT IS NOT A RESERVATION I THOUGHT. THEN WHY GET THIS LAND. IT WOULD BE THE MOST PROFITABLE PLACE TO PUT IT. TOO MANY PEOPLE AND GROUPS WERE GOING TO FIGHT THIS. IT WAS LIKE PUTTING A LAS VEGAS CASINO IN THE MIDDLE OF YOSEMITE NATIONAL PARK. IT WASN'T MEANT FOR THAT. THE TRIBE KEPT SAYING THEY WERE NOT GOING TO BACK DOWN. THAT THEY HAD A RIGHT AND THIS IS WHAT THEY WERE GOING TO DO. SO MANY PEOPLE GOT INVOLVED THAT THEY DID BACK DOWN. WHICH LED THEM TO THE ROHNERT PARK LOCATION.

WHEN THEY MET WITH THE ROHNERT PARK CITY COUNCIL IT SEEMED THEY COULD MEET THEIR NEEDS. THEIR RESPONSE FOR LEAVING SEARS POINT WAS THEY WERE BEING GOOD NEIGHBORS. THE ROHNERT PARK CITY COUNCIL HELD MEETINGS TO ALLOW THE RESIDENTS TO VOICE THEIR CONCERNS. EACH SIDE CAME OUT. BUT WHEN THE CITY COUNCIL NEGOTIATED WITH THE TRIBE THEY DID BEHIND CLOSED DOORS. A COUNCIL MEMBER JAKE MACKENZIE, WHO INVITED THE TRIBE THERE IN THE FIRST PLACE, OBJECTED TO HOW THINGS WERE HANDLED. I GUESS HE WANTED TO ALLOW THE PUBLIC TO SEE EVERYTHING WAS ON THE UP AND UP. AT A MEETING I ATTENDED HE SAID HE FILED SOME PAPER WORK WITH THE GRAND JURY OF SONOMA COUNTY ABOUT THESE DEALINGS. SO I ASSUME SOMETHING ISN'T RIGHT WHEN A CITY COUNCIL MEMBER POINTS THE FINGER AT HIS FELLOW COUNCIL MEMBERS. THE ROHNERT PARK CITY COUNCIL WENT AHEAD AND SIGNED A MEMORANDUM OF UNDERSTANDING WITH THE GRATON TRIBE. THERE ARE MANY THINGS WRONG WITH THIS MOU AND I WILL EXPLAIN THEM LATER. IT SEEMED THE CITY COUNCIL HELD PUBLIC MEETINGS FOR COMMENT BUT NEVER LISTENED TO WHAT ANYONE SAID. THE RP CITY COUNCIL OBVIOUSLY IGNORED THE WILL OF THE PEOPLE WHICH IS WHY THEY ARE BEING RECALLED.
THE ENTIRE CITY COUNCIL EXCEPT JAKE MACKENZIE ARE TARGETED FOR RECALL. WHEN THE SONOMA COUNTY BOARD OF SUPERVISORS DID NOT OPPOSE THE CASINO SITE THE PUBLIC MOVED TO RECALL THEM ALSO. THE BOARD OF SUPERVISORS QUICKLY CHANGED THEIR TUNE AND OFFICIALLY OPPOSED THE SITE WITH A VOTE. THIS

DEMOSTRATED THE PUBLICS VIEW OF THIS CASINO SITE. NO ONE DENIES THE GRATON TRIBES RIGHT TO A RESERVATION OR A CASINO. JUST NOT IN AN AREA THAT WOULD DESTROY THE COMMUNITIES OF FIVE CITIES.

UNDERSTANDING THE MOU IS VERY CRITICAL TO THE BIG PICTURE. THE ROHNERT PARK CITY COUNCIL NEGOTIATED THE MOU BEHIND CLOSE DOORS. IF YOU WERE TO READ THE MOU YOU WILL SEE THAT IT IS TO THE ADVANTAGE OF THE TRIBE. THE TRIBE OFFERS MONEY BUT THE MONEY IS STILL NEGOTIABLE ACCORDING TO CERTAIN CIRCUMSTANCES. THE MONEY IS SUPPOSE TO OFFSET ANY PROBLEMS. BUT ONCE THE TRIBE GETS THAT LAND INTO TRUST THE TRIBE WILL HAVE ALL THE POWER. A LOT OF CRITICS ALL AGREE THIS MOU HAS HOLES. THE CITY COUNCIL ADMITS THE LAND IS OUTSIDE OF CITY JURISDICTION AND YET THEY ARE NEGOTIATEING WITH LAND THAT ISN'T THEIRS. THE SONOMA BOARD OF SUPERVISORS HAD VOTED NO ON THE PROJECT AND IT IS IN THEIR JURISDICTION. WHAT THIS MOU IS SAYING IN SO MANY WORDS IS THE ROHNERT PARK CITY COUNCIL WILL HAVE NOTHING TO SAY OR DO ABOUT THIS PROJECT. BEFORE OR AFTER IT IS PUT INTO TRUST. DON'T YOU FIND THAT *VERY* INTERESTING. THIS MOU IS A PROMISE BY THE CITY COUNCIL NOT TO OPPOSE THIS CASINO/RESERVATION PROJECT. NOT NOW OR ANY FUTURE CITY COUNCIL. SO IN ESSENCE THAT ARE PLEDGEING THEIR SOUL AWAY. HOW IS THAT LEGAL? WHEN YOU READ THIS MOU TRY TO UNDERSTAND IT FROM MY POINT OF VIEW. AS SOMEONE WHO BELIEVES THE TRIBAL COUNCIL AND CITY COUNCIL ARE WORKING AGAINST FAIRNESS TO GET WHAT THEY WANT CONTRARY TO THE WILL OF THE PEOPLE. WHICH THEN LEADS TO THE REAL ISSUES.

THE TRUTH IS THE OUTCOME OF THIS GAME HAS ALREADY BEEN PREDETERMINED BY THE POWERS THAT BE. THE FIX IS IN. AS I HAVE SAID I AM VERY EXPERIENCED IN THIS TYPE OF SITUATION SO LISTEN TO WHAT I SAY. THE NEWSPAPER AND CITY COUNCIL HAVE SAID THE GRATON TRIBE IS GOING TO DO THIS ANYWAY SO IT IS BEST THEY GET MONEY. THE TRIBE WANTED SEARS POINT FOR OBVIOUS REASONS. IT IS CLOSE TO A HIGH POPULATION AREA. THE BAY AREA AND AT THE CROSS ROADS TO THE SACRAMENTO AREA. THE TRIBE ABANDONED THEIR ATTEMPT AT THIS PROPERTY BECAUSE OF THE OUT CRY. BUT THATS NOT WHAT THE TRIBE TELLS THE PUBLIC. THEY MAKE IT SOUND LIKE THEY ARE BEING A GOOD NEIGHBOR. THE GRATON TRIBE IS DOING EXACTLY WHAT THE UNITED AUBURN INDIAN COMMUNITY DID. THIS TRIBE IS NEAR LINCOLN, OUTSIDE OF SACRAMENTO. BOTH TRIBES INVESTOR IS STATION CASINO OUT OF LAS VEGAS. THUNDER VALLEY CASINO IS A PROTOTYPE FOR THE SEARS POINT/ROHNERT PARK CASINO. THE NEWSPAPER SHOWS THE SIMILARITIES. IF THE GRATON TRIBE DID NOT NEED THE CITY TO TAKE THIS LAND, THEY WOULD NOT PROPOSE A MOU. THEY WOULD HAVE TAKEN SEARS POINT. WHY DO YOU THINK THEY PROPOSED THAT IN THE FIRST PLACE? THE RULES SAY 1. THE LAND FOR A CASINO HAS TO BE IN TRUST. 2. IT CANNOT BE DENTRIMENTAL TO THE COMMUNITY. 3. THE GOVERNOR SHALL HAVE A SAY IN THE MATTER. BUT THATS NOT WHAT ALL THE POLITICIANS AND THE PAPER TELLS THE PEOPLE. THEY MAKE IT SOUND LIKE ITS INEVITABLE SO THE PUBLIC NEEDS TO GIVE UP OPPOSEING IT AND GET ON WITH LIFE. THE MOU IS THE PROOF TO THAT. EVERYTHING IN THAT MOU SAYS THE CITY CAN'T DO THIS OR DO THAT. IF THE CITY HAS NO POWER THEN WHY WOULD THAT BE STIPULATED. EVERYTHING IN THAT MOU IS TO KEEP THE CITY IN LINE TO PUTTING THIS LAND INTO TRUST. THE PUBLIC IS MISINFORMED WHICH SUGGESTS UNDERHANDED DEALING ARE AT WORK. THE NEWSPAPER REPORTS EVERYONE INVOLVED. THE BIG TIME DEVELOPERS WHO JUST BUY THE LAND ONLY TO SELL TO THE TRIBE.

EVERYONE INVOLVED IN THIS SEEM TO BE CONNECTED TO SOMEONE ELSE. LAST MONTH THE TRIBE DONATES TO THE LOCAL COLLEGE ONE MILLION DOLLARS. THE TRIBE DOESN'T HAVE MONEY YET. A COUPLE MONTHS AGO THEY GAVE THE COUNTY THE SEARS POINT PROPERTY THEY BOUGHT. SOMEWHERE IN THE REALM OF FIVE MILLON DOLLARS. IS THIS BEING A GOOD NEIGHBOR. NO IT ISN'T. THEY ARE BUYING THEIR WAY IN. WHILE THE PRESS COVERAGE DOES THE REST. WHICH LEADS TO ME.

I'VE BEEN FIGHTING THE CORRUPTION IN MY TRIBE FOR ABOUT EIGHT YEARS NOW. THE BIA AND THE NIGC HAVE EITHER NOT DONE THEIR JOB OR PLAIN THWARTED MY EFFORTS. YOU GO CHECK AT THE SACRAMENTO OFFICES ON WHO I AM. THEY MAY NOT LIKE ME BUT THEY CANNOT DISPUTE MY WORDS. NOW A POSSIBLE HAZZARD IS COMMING TO MY HOME. I KNOW THE TRUTH ABOUT INDIAN GAMING. DON'T TRY TO TELL ME DIFFERENT. I'VE EARNED MY WORDS, I'VE EARNED MY RIGHT. THIS IS A BAD LOCATION FOR A CASINO. JUST AS THE SEARS POINT SITE WAS. THE TRUTH IS THIS CASINO COULD GO ANYWHERE AND MAKE MONEY. STATION CASINO, (NOT TRIBE), WANTS THIS TO HAPPEN. IN THE MIDDLE OF FIVE CITIES. THE HEART OF THE REGION. THE WHOLE PURPOSE OF INDIAN GAMNG WAS TO BRING PEOPLE TO THE OUT OF THE WAY RESERVATION. SOMEHOW THEY GOT AROUND THAT. THAT CASINO THERE *WILL* DESTROY THE AREAS WATER SUPPLY. ALL BECAUSE THE TRIBE AND INVESTOR ARE GREEDY. WHY DON'T THEY PROPOSE A CASINO NEAR SAN FRANCISCO? THE SENATOR WHO HELPED THEM WOULDN'T LIKE THAT. I'VE GOT ALL THE ARTICLES CONCERNING THIS CASINO. READ WHAT THEY SAY. WHEN YOU'VE SEEN ALL THE DIRTY CORRUPTION I'VE SEEN YOU CAN'T HELP BUT SAY SOMETHING ISN'T RIGHT. I'VE TRIED TO PUBLISH MY VIEW IN THE PRESS DEMOCRAT NEWSPAPER. IN 'LET THE PUBLIC SPEAK', EDITORIAL SECTION. ONLY TO BE DENIED. I'M TOLD ITS BECAUSE THE EDITORIAL DIRECTOR IS FRIENDS WITH THE THEN MAYOR AND THE TRIBES CHAIRMAN. THEY FEAR WHAT I HAVE TO SAY. I SPEAK FROM EXPERIENCE IS WHY. I WILL INCLUDE MY PIECES. ALSO THE TRIBE WAS TRYING TO SAY THERE WAS HATE MAIL AND THE PAPER TRIED TO BACK THEM UP, WHEN THEY WENT TO THE COUNTY'S ANTI DISCRIMINATION BOARD. YET THE PAPER WON'T ALLOW ME TO BE HEARD. HOW IS THIS FAIR. DEMOCRACY IS AT STAKE. THE PUBLIC IS BEING MISLED BY THOSE IN POWER. WHAT THIS TRIBE IS DOING IS MAKING IT WORSE FOR ALL NATIVE AMERICANS. THIS TRIBE IS CHEATNG AND LYING TO GET WHAT THEY WANT AT THE PUBLICS EXPENSE. THE INVESTORS MONEY IS BUYING INFLUENCE. JUST LIKE WHAT HAPPENED WITH THE CLOVERDALE TRIBES ATTEMPT IN THE MID NINETIES IN PETALUMA. I WAS THERE TOO. I BEEN INVOLVED IN A LOT OF BATTLES AND MY EXPERIENCE TELLS ME THIS IS NOT RIGHT. BECAUSE OF WHAT CAN HAPPEN WITH A TRIBE, CASINO, OR RESERVATION, THIS CANNOT BE.

MY HOPE IS YOU WILL LISTEN AND CONSIDER WHAT I HAVE SAID. I AND PEOPLE LIKE ME HAVE TO LIVE WITH THE OUTCOME. I KNOW THE TRIBE. I WOULDN'T WANT THEM DESTROYING MY HOME. UNTIL THE FEDERAL GOVERNMENT SHARPENS THE LAWS CONCERNING INDIAN TRIBES AND THEIR GAMING THEY SHOULD NOT BE ALLOWED TO CASINO SHOP. THAT LEAVES THEM AT THE MERCY OF THE INVESTORS. THEY NOT ONLY WILL DESTROY THE TRIBE BUT ALSO THE AREA. THE TRIBE NEVER SAID ANYTHING ABOUT A RESERVATION. JUST A CASINO. THATS NOT RIGHT. AT LEAST MY RESERVATION HAS A TRIBAL BUILDING, GYM, AND A SWIMMING POOL. IF YOU HAVE ANY QUESTIONS THEN CALL ME. IF YOU WISH TO SEE ALL THE NEWSPAPER ARTICLES I HAVE THEM. AS I HAVE SAID TO THE BIA MANY TIMES. THE FEDERAL GOVERNMENT HAS A TRUST RESPONDSIBILTY WITH THE TRIBES. TO LOOK OUT FOR THEM AND TAKE CARE OF THEM. THEY ARE QUASI SOVEREIGN NATIONS. BY THE

GOVERNMENT NOT CONSIDERING THESE IDEAS OF CORRUPTION AND BACK ROOM DEALINGS THEY ARE CONDEMMING THE TRIBE TO REAP WHAT THEY'VE SOWN. NOT ONLY WILL THE TRIBE PAY FOR THIS IN THE FUTURE, BUT SO WILL THE COMMUNITY THAT THEY ARE A PART OF. TRUST ME WHEN I SAY THAT.

MARCH 17,2004

CORREY ALCANTRA
2222 WESTWOOD DR.
SANTA ROSA CA 95407
707 527-6967

June 13, [illegible]

AGAIN I'D LIKE TO ENLIGHTEN THE PEOPLE OF SONOMA COUNTY AS WELL AS CALIFORNIA. I'M A MEMBER OF COYOTE VALLEY RESERVATION IN UKIAH. MY TRIBAL COUNCIL STILL REFUSES TO LEAVE OFFICE. THEIR IS NO DUE PROCESS WHICH IS THE BACK BONE OF ANY DEMOCRACY. ON WHO'S DESK DOES IT SAY 'THE BUCK STOPS HERE', I WISH SOMEONE WOULD TELL ME. ITS THE WILD WEST ON ANY RESERVATION. NOW A RESERVATION IS TRYING TO POP UP SMACK DAB IN THE MIDDLE OF EVERYTHING. I DON'T AGREE WITH THE GRATON RANCHERIA TRYING TO PUT A CASINO NEAR SEARS POINT. NOTICE I SAY CASINO NOT RANCHERIA. THEY'VE SAID THEY WERE ONLY GOING TO PUT TEN HOUSES THERE. HOW CAN THAT BE CONSIDERED THEIR HOMELAND? THEN WHY GET THIS LAND. BECAUSE ITS THE MOST PROFITABLE PLACE FOR A CASINO. IF THAT IS THE CASE THEN ITS ABOUT THE MONEY. WHAT ABOUT THE OTHER CASINOS THAT BUS PEOPLE FROM THE BAY AREA. THE WHOLE PURPOSE OF A CASINO IS TO BRING PEOPLE TO THEIR RESERVATION AND HELP THE TRIBE BECOME SELF SUFFICIENT. THE GRATON BAND IS TRYING TO GET A STRANGLE HOLD ON ALL THE NOTHERN TRIBES. SO I TAKE OFFENSE TO ANYONE BRING UP THE INDIAN ISSUE. NO MATTER WHERE THIS CASINO GOES IT WILL MAKE MONEY. NO ONE NEEDS TO GET GREEDY. LETS UNDERSTAND THIS A LITTLE MORE. I KNOW QUITE A FEW INDIANS WITH DRINKING PROBLEMS. AND YET THEIR GOING TO ALLOW ALCOHOL THEIR. PERSONALLY I DON'T DRINK. IT WILL NOT ONLY STEAL YOUR LIFE BUT YOUR SOUL. DOESN'T IT GET VERY FOGGY OUT THERE? THEN WHY? I'VE BEEN FIGHTING FOR SIX YEARS TO RIGHT THE WRONGS THAT HAVE BEEN COMMITTED AT MY RESERVATION. I'VE WON ALL THE BATTLES BUT NOT THE WAR. THE MONEY FROM THAT CASINO IS THE DIFFERENCE. COMES BIG MONEY COMES BIG INFLUENCE. INFLUENCE FROM THOSE WHOM DON'T KEEP THEIR WORD. ONCE THEY ARE IN THEY CAN DO SERIOUS DAMAGE. HEAR ME WHEN I TELL YOU THIS. IN ALL MY YEARS IN BATTLE I'VE LEARNED THIS. IT WAS A HARD LESSON FOR ME TO LEARN....NO ONE CARES. NOT THE B.I.A., THE N.I.G.C. OR THE DEPARTMENT OF INTERIOR. I GUESS THEY HAVEN'T HEARD OF LIFE, LIBERTY, OR THE PURSUIT OF HAPPINESS. DOES MY LIFE MEAN NOTHING? TREAT ME AS YOU'D WANT TO BE TREATED. MY POINT IS THERE IS LITTLE OVERSITE. ONCE THEIR IN, THATS THE END OF THE GAME. NO MAN IS FREE UNTIL ALL MEN ARE FREE. UNTILL A COMPROMISE IS MADE WE ARE ALL UNDER TYRANNY. THIS IS A BAD PLACE FOR A CASINO. THE GRATON MEMBERS ARE DICTATING TO EVERYONE ON WHAT THEIR GOING TO DO DESPITE ANYONES OBJECTIONS. THAT IS PLAIN WRONG. WE'RE ALL IN THIS TOGETHER. IF THE GRATON RANCHERIA GOES FORWARD WITH THIS AMIST ALL THIS OPPOSITION THEN WE ALL WILL KNOW ITS NOT ABOUT LOVE THY NEIGHBOR. ITS ABOUT THE ROOT OF ALL EVIL. MONEY.

CORREY ALCANTRA SANTA ROSA

Oct 28, 2003
Resubmitted March. 1, 2004

I WOULD LIKE TO SHARE MY ANGUISH AND FRUSTRATION. I AM A MEMBER OF THE COYOTE VALLEY TRIBE IN UKIAH. I AM PRACTICALLY A EXPERT ON INDIAN CASINOS, SO HEAR WHAT I HAVE TO SAY. I KNOW ALL THE TRICKS MAINLY BECAUSE THEY WERE USED ON ME. HERE IS THE TRUTH AS I KNOW IT.

MY TRIBAL COUNCIL'S TERMS HAVE EXPIRED FOUR YEARS AGO BUT THEY REFUSE TO LEAVE OFFICE. THEY HAVE VIOLATED MEMBERS CIVIL RIGHTS AND YET THEY GET AWAY WITH IT. PRISCILLA HUNTER, THE TRIBAL CHAIR HAD EVEN GONE AS FAR AS TO TRY AND ATTACK ME FOR PETTIONING HER GOVERNMENT. THE TRIBAL COUNCIL USED THIS TO KEEP ME OFF MY OWN RESERVATION FOR A YEAR WITHOUT GIVING ME MY DUE PROCESS. THE TRIBAL COUNCIL EVEN TRIED TO HAVE ME ARRESTED FOR TRESSPASSING. THE BIA HAD SAID THIS WAS ILLEGAL. BUT I GUESS THEIR IS NO TRUTH OR JUSTICE ON INDIAN LAND. THE TRIBAL COUNCIL WAS CAUGHT FOR MISUSE OF CASINO ASSETS IN 2001. INSTEAD OF PROSECUTING THEM THE NIGC JUST ORDERED THEM TO PAY IT BACK. ISN'T THAT HAVING THE FOX WATCH THE HEN HOUSE? IT IS THE WILD WEST ON MY RESERVATION. NO TRUTH, NO JUSTICE. EVEN NOW THE MEMBERS CONTINUE TO ASK TO SEE THE FINIANCIAL BOOKS ONLY TO BE IGNORED. THE BIA IS NO HELP. IN FACT THEY HAVE THWARTED THE MEMBERS ATTEMPTS TO HELP THEMSELVES. I WONDER TO MYSELF IF THESE THINGS WOULD HAPPEN HERE IN THE UNITED STATES? NO THEY WOULDN'T. DO YOU KNOW WHY? BECAUSE SOMEBODY SOMEWHERE CARES. I'VE BEEN FIGHTING THIS LYING AND CHEATING FOR SIX YEARS. I WON ALL MY BATTLES AND YET I AM STILL HELD OUT. THE POWERS THAT BE HAVE CHEATED ME. IT WILL ALL COME OUT ONE DAY. BUT I FEAR THAT WILL BE TOO LATE. ALL I EVER ASKED WAS TO TREAT ME AS YOU'D WANT TO BE TREATED. SOMEONE TELL ME WHO I CAN RUN TO. WHO HOLDS THE POWER TO CORRECT THE INJUSTICE THAT HAVE BEEN DONE? WELL ONE MAN CAN MAKE A DIFFERENCE AND I WON'T GO AWAY UNTIL I'VE SUCCEEDED. THIS IS THE DARK SIDE TO CASINOS. WHICH LEADS ME TO THE ONE PROPOSED IN ROHNERT PARK.

THIS IS MY HOME AND NOTHING MEANS MORE TO ME THAN THAT. WHICH IS WHY I AM STANDING UP TO BE HEARD. I'VE SEEN THE EVIL OF INDIAN CASINOS. THE GREED THAT IT PRODUCES. THE FACT THAT IT IS PROPOSED SO CLOSE TO A CITY CAUSES ME GREAT CONCERN. WHAT KEEPS AN INDIAN CASINO OUT OF TROUBLE IS THE FACT THEY'RE NOT CLOSE. THEY ARE IN ISOLATED LOCATIONS. THE WHOLE PURPOSE OF INDIAN GAMING WAS TO BRING PEOPLE TO THEIR OUT OF THE WAY RESERVATIONS. BUT SOMEHOW THAT WON'T BE THE CASE HERE. I WONDER HOW THAT HAPPENED? I KNOW OF THE DRUGS AND CRIME. THERE IS SO MUCH MONEY THERE IT CANNOT BE AVOIDED. THE TRUTH IS THIS CASINO COULD GO ANYWHERE AND MAKE MONEY. NO ONE NEEDS TO CAUSE ANYONE ELSE ANY HEARTACHES. IF THE GRATON BAND COULD HAVE TAKEN SEARS POINT THEY WOULD HAVE. THE TRIBE HAS TO MITIGATE WITH THE COMMUNITY. NOT THE OTHER WAY AROUND. THIS IS NOT A RESERVATION. IT IS NOT TRIBAL LAND YET. I THINK THAT IS WHAT THE PUBLIC IS MISSING. THIS CASINO CANNOT BE DETRIMENTAL TO THE COMMUNITY. IT IS THE CITY COUNCIL THAT IS SAYING IT WON'T. MY ADVICE IS TO RECALL THE ROHNERT PARK CITY COUNCIL AND WRITE TO YOUR ELECTED OFFICIALS IN CONGRESS. THE PEOPLE HAVE A VOICE. THE GRATON BAND NEEDS TO BE NEAR ITS ORIGINAL RANCHERIA. THATS WHY THEY'RE CALLED GRATON ISN'T IT? THIS TRIBE NEEDS TO FIND A SUITABLE LOCATION BEFORE THEY WIND UP WITH NOTHING.

I'VE BEEN LOCKED IN BATTLE TOO LONG NOT TO KNOW THE TRUTH. A CASINO CAN BE A GREAT THING BUT ALSO A TERRIBLE ONE. THE MEMBERS DON'T ALWAYS BENEFIT. PROMISES AREN'T ALWAYS KEPT. ONLY BECAUSE OF THE GREED FOR MONEY AND LUST FOR POWER. I'VE SEEN IT. I'VE LIVED IT. THE AVERAGE PERSON ON THE STREET DOESN'T THINK IT WILL

EFFECT THEM BUT IT WILL. MONEY MAKES THE WORLD GO AROUND. THATS THE SAD TRUTH. BECAUSE OF THE SOVERIGN STATUS OF A TRIBE ANYTHING CAN HAPPEN OUT THERE. THERE IS SO MUCH MONEY IT CAN DESTROY. MY PROBLEMS STEM FROM THE ABSOLUTE POWER OF TRIBAL GOVERNMENT TO DO ANYTHING THEY PLEASE. WITHOUT REGARD FOR THE LAW OR ANYONES WELL BEING. WITH NO ONE OVERSEEING THEM THINGS GET OUT OF HAND. I DON'T DENY THE GRATON BAND THEIR RIGHT TO A RESERVATION JUST A CASINO ANYWHERE THEY WANT. BUT I'M SURE STATION CASINO WOULDN'T AGREE WITH ME. THATS THEIR PROBLEM. UNTIL THE FEDERAL GOVERNMENT STAIGHTENS OUT THE LAWS CONCERNING TRIBES THEY SHOULD NOT BE ALLOWED TO PUT UP ANYWHERE. THE TRUTH WILL COME OUT I PROMISE. JUSTICE WILL BE GOTTEN BECAUSE AFTER ALL THIS IS THE UNITED STATES OF AMERICA. WHERE THE WORDS 'LIFE, LIBERTY AND THE PURSUIT OF HAPPINESS' MEAN SOMETHING. WHERE 'TRUTH, JUSTICE AND THE AMERICAN WAY' STILL RING TRUE. AT LEAST I BELIEVE SO.

CORREY ALCANTRA
2222 WESTWOOD DR SR
707 527-6967

METROPOLITAN
TRANSPORTATION
COMMISSION

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
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TTY/TDD: 510.464.7769
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Web site: www.mtc.ca.gov

RECEIVED
NATIONAL INDIAN
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2004 MAR 30 AM 9:30

Steve Kinsey, Chair
Marin County and Cities

Jon Rubin, Vice Chair
San Francisco Mayor's Appointee

Tom Ammiano
City and County of San Francisco

Irma L. Anderson
Cities of Contra Costa County

Tom Azumbrado
U.S. Department of Housing and Urban Development

James T. Beall Jr.
Santa Clara County

Mark DeSaulnier
Contra Costa County

Bill Dodd
Napa County and Cities

Dorene M. Giacopini
U.S. Department of Transportation

Scott Haggerty
Alameda County

Barbara Kaufman
San Francisco Bay Conservation and Development Commission

Sue Lempert
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John McLemore
Cities of Santa Clara County

Michael D. Nevin
San Mateo County

Bijan Sartipi
State Business, Transportation and Housing Agency

James P. Spering
Solano County and Cities

Pamela Torliatt
Association of Bay Area Governments

Sharon Wright
Sonoma County and Cities

Shelia Young
Cities of Alameda County

Steve Heminger
Executive Director

Ann Flemer
Deputy Director/Operations

Therese W. McMillan
Deputy Director/Policy

March 23, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, D.C. 20005

RE: DIES Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

The Metropolitan Transportation Commission (MTC) appreciates the opportunity to comment on the scope of the EIS for the Graton Rancheria Casino and Hotel Project. We request the analysis of transportation related impacts address the following:

1. The estimated increase in travel due to the project in year 2030 (the horizon year for the region's long range transportation plan *Transportation 2030*) including trips by patrons and employees and trips originating both within and beyond the nine-county Bay Area.
2. The cumulative impacts of projected increase in travel on existing and planned transportation infrastructure in the Highway 101 corridor including mainline highway operations, major interchanges, major local arterial roadways, transit services, and bike and pedestrian travel in year 2030. With respect to this point, we request the following:
    - The recently updated Sonoma County traffic model be used for analysis of future transportation conditions.
    - The analysis incorporate assumptions on future transportation infrastructure, planned development, and county and regional travel patterns in the most recent Sonoma County General plan and Regional Transportation Plan (*Transportation 2030*). Please examine the transportation impacts both with and without the planned Sonoma Marin Area Transit (SMART) commuter rail, which is included in the regional transit expansion plan but is currently not fully funded for operation.
3. Identify transportation improvements needed to serve project employees and patrons and address the associate impacts by minimizing traffic delays, maintaining adequate service levels and ensuring safety for bicyclists and pedestrians as well as motorists. Please identify how transit access will be provided through public and/or private operators.

4. Estimate the cost of any needed improvements to mitigate the project's traffic impacts, including an estimate of any incremental transit and paratransit operating cost increases; the EIS should also identify potential sources of funding to implement these improvements .
5. Evaluate motor vehicle emissions associated with increased traffic and compare to thresholds established by the Bay Area Air Quality Management District.

If you have any questions regarding these comments, please contact Lisa Klein of my staff at 510.464.7832.

Sincerely,

Doug Kimsey
Planning Manager

DK:lk

J:\SECTION\PLANNING\Klein\Coordination\Environmental Documents\Graton NOI.doc

``DEIS Scoping Comments, Graton Rancheria Casino Project''

TO: **Christine Nagle, NEPA Coordinator**
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington, DC 20005
Telephone (202) 632-7003

Peggy Soares

FROM: **Peggy Soares**
4319 Primrose Avenue
Santa Rosa, CA 95407

This proposed property is in direct violation with the Sonoma County General Plan. This property is designated as the community separator.

How are you going to address the substantial growth in an area that has been designated to be land for agricultural, community separator and undeveloped?

Houses on Wilfred Avenue will be eliminated to widen Wilfred Avenue and make access to the proposed casino site.

How are you going to address the loss of these homes ?

Statistics indicate that within a 10-mile radius of a casino property values drop 10%. With the proposed casino site drilling 2 wells 1,000 feet deep our wells will go dry, there will be excessive noise, air pollution, additional traffic on narrow country roads, neon lights 24 hours a day 7 days a week, failing septics due to flooding, increased crime and the loss of rural quiet life.

How are you going to address the lost of property values, failing septics, dry wells, excessive noise?

I think Skaggs Island is a better location, it is not in a residence area, not in the 100 year flood plan, not on a county separator, people would not loss their homes due to wells going dry and becoming contaminated, septics won't be failing and property values dropping. There is more than enough land for the casino plus an addition 3,000 areas to be used for something else. There is already water and sewer available at Skaggs Island and the site is more generally located between Marin and Sonoma County, allowing for a lot more traffic to the casino.

SIERRA CLUB
FOUNDED 1892

SONOMA GROUP
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P.O. Box 466, Santa Rosa CA 95402-0466
(707) 544-7651 Fax: (707) 544-986

RECEIVED
NATIONAL INDIAN GAMING COMMISSION
2004 MAR 30 AM 9:30

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street NW, 9th Floor
Washington, D.C. 20005

March 10, 2004

Re: DEIS Scoping Comments – Graton Rancheria Casino Project

Dear Ms. Nagle;

The Sonoma Group of the Sierra Club opposes casino development on the 450-acre parcel just outside of Rohnert Park, California. There are strong environmental reasons not to build a casino on this new site.

The Rohnert Park site is located in a greenbelt; a community separator region established by the county to concentrate development in cities, rather than to allow it piecemeal in the countryside. This particular greenbelt also separates urban Rohnert Park from the Laguna de Santa Rosa - one of the largest freshwater wetland areas in coastal California. This vital watershed is threatened on all sides by city pollution runoff and development.

The proposed casino site is in a watershed that drains directly into the Laguna, as well as being in a flood plain and a zone designated for groundwater recharge. The site is environmentally sensitive, especially with respect to water pollution, endangered species, vernal pools and habitat loss. It is also land identified under the Williamson Act for agricultural preservation.

The Sonoma County General Plan speaks for the community on this issue. The plan places restrictions on how and where to build, and limits the loss of agricultural land and open space. We stand by the General Plan principle that new development needs to be concentrated within established Urban Growth Boundaries.

Under the County's General Plan, such a large project would never ordinarily have been considered at this location, which is zoned for agricultural use. It is only possible because of the unusual case of the Federated Indians of the Graton Rancheria, which has the right to build a casino but has no established tribal lands. When its new tribal lands are approved, they will become automatically exempt from local land use laws. Since the Tribe and its financial backers plan to build a large commercial complex, it should be located where it will not conflict with county environmental planning. Therefore, we request that the DEIS include environmental analysis of several practical alternative sites which are within urban growth boundaries.

Another strong objection that the Sierra Club has to the proposed casino is that the Tribe is not legally constrained to follow county and state land use and environmental regulations. This problem is bigger than the specifics of the Rohnert Park site. Unfortunately, the Tribal-State Gaming Compact, which outlines the rules for casinos, does not adequately protect the interests of the environment; it asks for only a good-faith effort by the casino operators to comply with regulations. We feel that environmental regulations must be explicitly protected by the Compact in the same way that casino employee rights, building codes and health and safety regulations are protected.

Any large development like the Graton Rancheria casino should not be built outside urban growth boundaries. The Sierra Club opposes this site and supports the County General Plan and environmental responsibility.

Thank you for your consideration.

Sincerely,

Peter Ashcroft
Chair, Sonoma Group
Sierra Club

To explore, enjoy and protect the earth.

728

1158 Santa Cruz Way
Rohnert Park, CA 94928
707-585-8448
timlb@pacbell.net

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March 25, 2004

National Indian Gaming Commission
Attn: Christine Nagle
1441 L. Street NW, 9th Floor
Washington, DC 20005

Re: "DEIS Scoping Comments, Graton Rancheria Casino Project"

Dear Ms. Nagle:

I attended the public hearing that was held on Wednesday, March 10th and below you will find issues that I would like addressed before making your decision.

Resident Issues:

- It could be reasonably expected that a region of depressed real estate would be created around the entire casino project where property values are negatively impacted and buyers are scarce. Those that live in the surrounding area of the proposed casino would not be able to afford to relocate in Sonoma County, due to a the high prices of real estate. Some of the residents are retired, disabled and on limited income. How could this be mitigated?

- The residents in the surrounding area are on wells. If the proposed casino were to come in and dig deep wells, which they have proposed to do, it would deplete the water needed at the surrounding homes. Please refer to the article written in The Community Voice Friday, March 19, 2004. How could this be mitigated?

- The casino site is adjacent to Rancho Grande Mobile Home Park with over 750 residents including children. The casino is also in close proximity to Rancho Feliz Mobile Home Park with over 500 residents including numerous small children. The proposed casino is to be open 24 hours a day. How is the lighting to be mitigated that will affect all areas not just those directly surrounding the site?

Environmental Issues:

- The proposed site sits directly across the Laguna de Santa Rosa water system that is the largest fresh water wetland complex in Northern California and an integral part of the environment and economy of Sonoma County. The Laguna is an important stopover for thousands of birds migrating along the Pacific Flyway and is the permanent home to a wide variety of life dependent on the wetland and the surrounding upland areas. In addition to the habitat it provides for wildlife, the Laguna is used for agricultural, recreational and educational purposes. The proposed site is the habitat of the tiger salamander and several other endangered animals and plants. It serves as a natural holding basin during our wet season and as an overflow area for the Russian River during floods. In some wetlands the detained water can recharge the groundwater thus storing water for future needs. Please refer to the map of the Laguna de Santa Rosa I've included. How can this be mitigated?

- The Casino is in violation of the Sonoma County General Plan as the site is designated as Open Space/Community Separator for agricultural use only. The proposed Casino is to be constructed on a site that is a Community Separator/Open Space/ Green belt Space that can <u>never</u> be mitigated once destroyed.

- The Department of the Army Corps of Engineers identified the proposed casino site in September of 1999 as a Hazardous, Toxic, Radioactive Waste Site and Ordinance and Explosive Waste Site ERP/FUDS Site No J09CA747000. This requires that a PEA (Preliminary Endangerment Assessment) be done by the Department of Defense.

Alternative Sites:

- Skaggs Island lies just north of Highway 37 in Sonoma County. It also is sufficiently distant from both residential and community locations as to minimize the impact with less environmental impact. It is a several hundred-acre site with water, sewage and additional infrastructure already in place. The site is also accessible from Highway 37 and is approximately halfway between Highway 101 and Highway 80. These are both major thoroughfares and would allow access as the initial Highway 37/Lakeville site.

Please take serious consideration of my concerns regarding this proposed casino location.

Sincerely,

Lisa Bagwell

Lisa Bagwell

cc: Gov. Arnold Schwarzenegger/ Mr. Peter Siggins
Senator Dianne Feinstein
U.S. Rep. Lynn Woolsey
Hon. Ben Nighthorse Campbell
Senator Daniel K. Inouye
Senator John McCain

very Blanquie and Wanderscheid. Park Community Center. The event included a red carpet treatment, paparazzi, and music by Lauren Xie.

Photo by Franklin Lee

Worries over groundwater supplies add up to continuance of conservation measures

By Jud Snyder

Now that the majority of homeowners in Rohnert Park are now getting water meter bills every other month does this mean all urban water problems are solved? No, not really.

There are clouds on the horizon and they're not rain clouds. To put it bluntly, residential water conservation is the Golden Rule to live by and this rule will be around for the foreseeable future. Make that five years minimum and quite likely a decade or more.

The simple act of turning on a faucet in the home carries a lot of background baggage.

To get a handle on this, we talked with City Engineer Toni Bertolero. People ask "Who's this guy, Tony, telling us we better conserve water?" They soon discover "Tony" is really "Toni," an attractive woman with all sorts of engineering degrees who's the city engineer for both Cotati and Rohnert Park and also a staff engineer with the consulting firm of Winzler and Kelly in Santa Rosa, the county's premier consulting firm in hydrogeological matters.

The governing of water allocation to Sonoma County cities involves agencies from the federal Fish and Wildlife Dept., National Ocean and Atmosphere Agency (NOAA). U.S. Geological Service, California Fish and Wildlife agencies, U.S. Army Corps of Engineers, to the Sonoma County Water Agency (SCWA) and a myriad of consulting firms including Winzler and Kelly and Brelje and Race.

Water for Sonoma County involves tapping the Eel River in Mendocino County into a reservoir (Pillsbury Lake) and then channeling it down to Lake Mendocino near Ukiah and then down to Lake Sonoma west of Healdsburg and the Russian River. To protect the endangered steelhead and salmon migratory runs in the Eel River, federal agencies are recommending this channeling be eliminated or sharply reduced to protect the migrating fish. This would put the Russian River summertime flows in peril and devastate the recreational activities such as swimming and kayaking on the river. Naturally, the federal suggestion has caused a storm of protest along the river.

That's just one big cloud on the horizon.

(Continued on page 2)

Claims of 'toxic waste' at old Cotati air strip

Allegations by casino foes draw quick rebuttal

By Jud Snyder

A new element was tossed into the Indian casino controversy when claims that the former Cotati U.S. Navy air strip west of the freeway is a "potential toxic waste site." According to Rev. Chip Worthington, the city could be "sued for millions of dollars" by residents. Worthington revealed his findings and made the charges before the Rohnert Park City Council and again at the March 10 public hearing held by federal agencies at Luther Burbank Center in Santa Rosa.

Neither the council or federal reps responded to the revelations.

But city hall was quick to rebut the reports.

"First of all, the land they're talking about is not in the proposed casino acreage," said City Manager Carl Leivo. "Second there have been environmental impact reports done here and no contaminants have been found in connection with the former air field."

What probably triggered the allegations of "toxic waste contamination" at the former air strip site was a March 8 letter to the Board of Supervisors from Marilee Taylor Montgomery concerning the Outer Landing Field (OLF) area west of the air strip. The Dept. of Defense has classified the air strip as a Formerly Used Defense Site (FUDS) and has it on a list of sites "eligible for cleanup" in a "remediation program" by the DoD.

Montgomery's letter contends "much of the 140.40 acre parcel of the proposed casino site was used for waste and refuse pits by the DoD both during and at the end of W.W. II." She mentions the parcel is "pock-marked with ground scars indicating multiple, large circular pits and one roughly rectangular scar, all of significant size, and all apparently man-made," and cited the "possibility of burial pits for refuse and/or toxic waste."

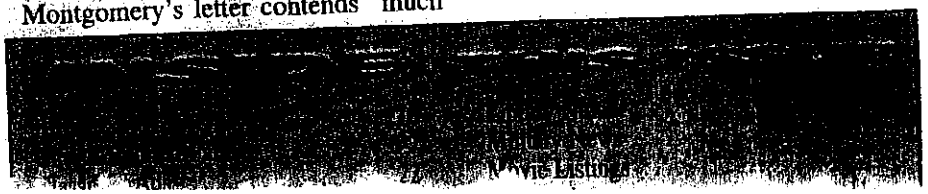
The area is south of RP Expressway.

Leivo noted this area was all pastures and hayfields. "Haven't they heard of vernal pools that dry up in the summer

(Continued on page 2)

WEATHER FACTS

Date	Low	High	Rain
Thu 3/11	39	81	–
Fri 3/12	39	78	–



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Rohnert Park • Cotati • Penngrove

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Groundwater supplies

(Continued from page 1)

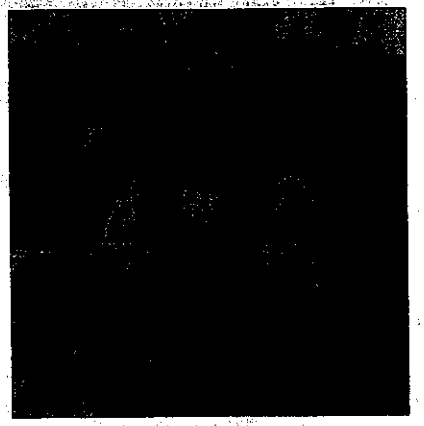
The second is the question of just how much water is under the Santa Rosa Plain? This vast underground sand, gravel and water mixture has been a source for 150 years.

"The USGS is preparing to do a groundwater study on the Santa Rosa Plain," said Bertolero. "It will take five years to accomplish and they haven't got the complete funding for it yet. But they should start the process this July."

Everyone knows the water table level in the Santa Rosa Plain has been dropping over the years as the county becomes more urbanized. It's a natural result of population growth.

Caught in the middle is Rohnert Park.

The city gets 60 percent of its drinking water from the aqueduct, the Russian River-Cotati Intertie controlled by the Sonoma County Water Agency, and 40 percent from its wells. The city has about 30 wells. "Some are low producers and some have been abandoned," said Bertolero.



Toni Bertolero, Rohnert Park's city engineer, says water conservation practices will be part of RP lifestyles for years to come.

"It's easy to point the finger at Rohnert Park," she added. "The biggest impact on water conservation here are the water meters." RP was the last city in the county to install residential water meters to replace the flat rate billing system.

"There have been lots of studies here but all the issues haven't been resolved," said Bertolero. "But it's obvious everyone's going to have to conserve water. This means checking the timing of lawn sprinklers, public education on xeriscape landscaping (plants and shrubbery demanding little or no water) and a lot of public education."

An example of xeriscaping is in the median strip of the RP Expressway-Commerce Blvd. intersection, a project built by RP-Cotati Rotary Club members. Another one will be set up by the RP Public Library.

An additional factor in water conservation is the use of recycled water. Bertolero noted Rohnert Park leads all other Sonoma County cities in the use of recycled water to irrigate its parks and athletic fields.

It's easy to see managing drinking water delivery systems in Sonoma County is an enormously complicated task with so many outside agencies involved.

Bertolero, the former Toni Magallanes, 45, Filipino-born, is married to Ottavio Bertolero, who is also an engineer. They have three children, 13, 11 and 6 in age. Do they have a lawn that needs irrigating? "No, we don't. We spend a lot of time in city parks."

She makes sure counters in city hall have ample supplies of water conservation brochures and the city's web site is also a good source of information on this vitally important subject.

The future of water supply from the Eel River and the USGS study of groundwater under the Santa Rosa Plain are both "long term" answers, said Bertolero. "For the short term, water conservation is the only answer."

Toxic waste

(Continued from page 1)

and leave depressions in the ground?"

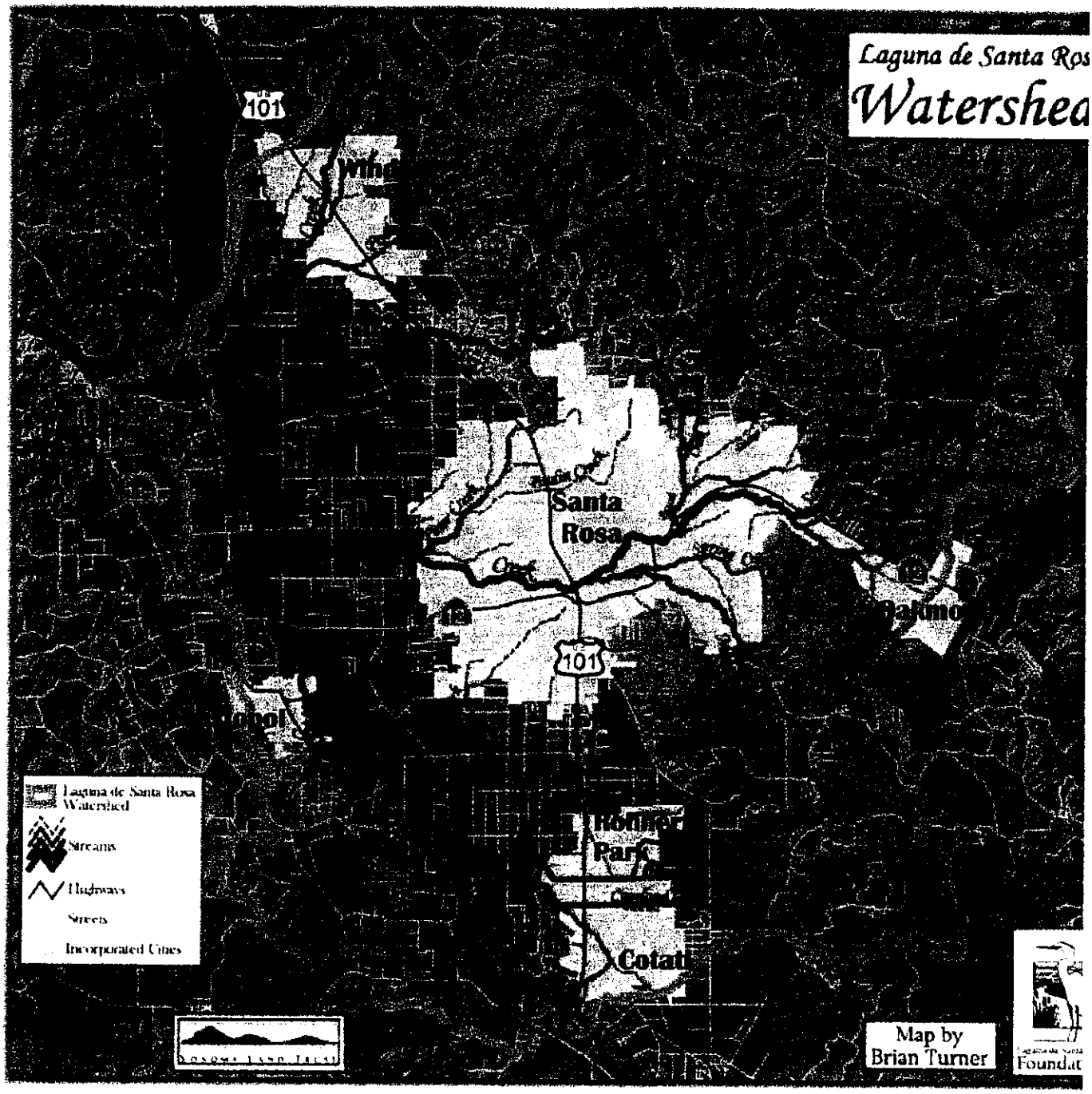
The anti-casino forces included a report from Environmental Geology Services, of Willowside Road in Santa Rosa, Marc W. Seeley, RG and REA-II, principal, titled, "Potential Hazardous Material Impacts, Former U.S. Navy Cotati Outer Landing Field and Down Gradient Areas, Rhonert (sic) Park, California."

Seeley's report, five single-Cotati OLF site as a declared potential hazardous waste site "recommended for exploration and possible remediation." His report mentions possible use of chlorinated solvents if aircraft maintenance "was performed at the site is not known," and "no effort has been made locate buried underground storage tanks." He also mentions "no effort has been made to locate possible buried underground unexploded ordinance" (sic), he meant "ordnance" apparently, and the "location of the machine gun range has not been verified or explored with regard sary research" to locate "potential buried ordinance (sic)" and any other toxic materials in the soil west of the former air strip (Cotati OLF) and its "proximity to the proposed development to the west (including the proposed casino project) ..."

In rebuttal to the Montgomery letter and Seeley's report, city hall sources said the Outer Landing Field (OLF) west of the former air strip is not part of the 460 acres the Federated Indians of Graton Rancheria are proposing for a casino and hotel. It's all south of RP Expressway and The field was designed in the configuration of an aircraft carrier deck to practice takeoffs and landings and for emergencies.

The rest of the area has been developed with many stores including Target, Food Max (formerly Food 4 Less) and Pacific Cinemas by Codding Enterprises. No reports of contaminated soils have been filed during their development.

The only incident of contaminants in the area stems from the former PG&E storage yard on the north side of RP Expressway near Labath


Laguna de Santa Ros
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Laguna de Santa Rosa Watershed
Streams
Highways
Streets
Incorporated Cities
Map by
Brian Turner

72

CITY OF PETALUMA

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Mayor

Mike Harris
Mike Healy
Bryant Moynihan
Mike O'Brien
E. Clark Thompson
Pamela Torliatt
Councilmembers

March 29, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005

RE: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

Thank you for the opportunity to comment on the scope of the Draft Environmental Impact Study for the proposed Graton Rancheria Casino Project on Stony Point Road, immediately east of the City of Rohnert Park, California. The City of Petaluma is located approximately seven miles south of the casino site and is the southerly terminus of Stony Point Road. Petaluma is also served by four interchanges at various points along U.S. Highway 101. We would request that the DEIS assess the following potentially significant environmental impacts that would directly affect the City of Petaluma and its citizens:

Housing

Sonoma County is one of the most expensive housing markets in the nation. In accordance with California state law, all cities and counties in California must accommodate, through their adopted Housing Elements of their respective General Plans, their fair share of regional housing need, including housing for very low, low and moderate income households (income determinations are based on U.S. Department of Housing and Urban Development established percentages of the County's median income). The City of Petaluma has consistently received state-mandated certification of its Housing Element and provides its fair share of the region's affordable housing units. Regional fair share housing numbers are predicated in part on regional job growth, and the City of Petaluma believes that the significant increase in traditionally low-paying service sector jobs that will be created by the casino, hotel and ancillary uses will result in a potentially significant increase in the number of affordable housing units we will be expected to absorb through the Regional Housing Needs Determination process. More importantly, the jobs created by the casino project will place greater demand on the already scarce availability of affordable housing units in Petaluma and increase competition with local resident and employee needs. We would expect that the Federated Indians of Graton Rancheria would provide employee housing on the casino site and that will be evaluated as part of the DEIS.

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Petaluma, CA 94952

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citymgr@ci.petaluma.ca.us

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Petaluma, CA 94952

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Petaluma, CA 94952

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E-Mail
gis@ci.petaluma.ca.us

Traffic

Traffic is directly related to the affordable housing issue, in that the high cost and lack of availability of local affordable housing for casino employees will result in more commute trips on already overcrowded local streets and highways. These traffic impacts, in addition to the traffic impacts associated with casino patrons traveling to and from the site must be evaluated and adequately mitigated in the DEIS. Specifically, Petaluma is concerned about the impacts to the following roadway segments and intersections:

- U.S. Highway 101 from the southerly Sonoma County line through Santa Rosa;
- U.S. Highway 101 interchanges and, where applicable, overcrossings at Petaluma Blvd. South, at Highway 116; at Washington Street; and at Old Redwood Highway;
- Petaluma Blvd. and D Street
- Petaluma Blvd. and East Washington Street;
- Petaluma Blvd. and Corona Road/Skillman Lane
- Old Redwood Highway and Stony Point Road;
- Old Redwood Highway and McDowell Blvd;
- Lakeville Highway/Lakeville Street and Caulfield;
- Lakeville Street and East Washington Street;
- Lakeville Street and Petaluma Blvd.

Due to the extreme congestion on U.S. Highway 101, we anticipate that northbound travelers to the casino from the San Francisco Bay Area are likely to leave the freeway and find alternate routes through Petaluma along Petaluma Boulevard and Lakeville. Petaluma's principal intersections along these routes are already at Levels of Service (LOS) below adopted Petaluma General Plan standards. Recent local development proposals have triggered CEQA-mandated environmental impact reports because of existing intersection capacity constraints.

We would also point out that as part of our on-going update of the City of Petaluma General Plan, we have developed our own traffic model and related database. Consistent traffic modeling assumptions and coordinated analysis has been an issue of great importance to the City in its discussions with the County of Sonoma, which has its own modeling software and assumptions. We would expect the DEIS traffic consultant to work closely with City staff to insure that the traffic analysis adequately describes, assesses and mitigates potentially significant local impacts. We can also provide copies of recent local traffic studies that may be pertinent to this project, as well as a description of on-going local projects that

will need to be considered as part of an adequate cumulative traffic impact analysis.

Economic Impacts

The casino, hotel and ancillary uses (restaurants, clubs, etc.) will create direct competition with Petaluma's existing hotels/motels, restaurants and card rooms. Petaluma has had a very active visitor program that continues to grow and generate much needed sales and transient occupancy taxes for the City. Given the uncertainty of the state budget, the City of Petaluma views any direct competition with these existing services as a potentially significant impact to our ability to maintain an adequate level of local services for our residents. The potential creation of extensive new retail development on the project site, particularly retail uses such as automobile dealerships, would be even more significant and detrimental to the City of Petaluma. The DEIS must evaluate the project's impacts on local sales and transient occupancy tax generating uses, and must disclose in the project description and subsequent analysis any anticipated future retail development on tribal lands. Even if future retail development is not part of the current or reasonably foreseeable project description, the NIGC and/or BIA must insure that any future retail development on the site shall be subject to subsequent impact analysis and mitigation. Because of the sovereign status of tribal lands relative to the application of federal, state and local sales and other taxes and reliance of local government on some of those same taxes to provide local services, the potentially significant impacts of future economic development on the site on local governments in the area cannot be overstated.

Cumulative and Growth-Inducing Impacts

This project will result in substantial cumulative and growth-inducing impacts in the subject areas already discussed above. In addition, the DEIS should consider cumulative impacts in the areas of: ground water supply and groundwater recharge; the regional Russian River water supply and transmission system and the potential impacts to contractors to that system resulting from the potential need for the project site to hook-up to that system; local police and fires services with existing or anticipated mutual aid and emergency operations obligations; and the life of the County's central waste disposal site and the operations of the countywide solid waste joint powers authority. The DEIS must insure that the geographic scope of the cumulative and growth-inducing impacts analysis is broad enough to adequately address potential impacts to the surrounding area, including impacts that may occur within the corporate limits of the City of Petaluma.

Mitigation Timing and Authority

One of the principal functions of an environmental impact statement is the identification of measures to adequately mitigate potential impacts. These measures are critical to successfully integrating the project into the surrounding community. Timely implementation and effective, on-going monitoring are essential to fully mitigating identified significant impacts. To meet the test of adequacy, the DEIS for this project must establish specific timelines for the implementation of all mitigation measures and clearly assign responsibility for their completion. All mitigations must be feasible and the designated responsible agency must have the authority and the resources to carry out the described measures. This is particularly important for identified off-site mitigations that may result directly from the proposed project or are cumulative in nature. Given the significant project-related and cumulative impacts that are likely to be generated by this project, the City of Petaluma will expect that the Federated Indians of Graton Rancheria and the federal authorizing agencies will accept and fulfill their mitigation responsibilities to the extent established by the DEIS so that neighboring communities will not be adversely affected.

Once again, we thank you for the opportunity to comment on the scope of the DEIS for the Graton Rancheria Casino Project and look forward to maintaining an active role in the review of this project. If you have any questions or need any further information, please do not hesitate to contact me.

Sincerely,

Michael A. Bierman

Michael A. Bierman
City Manager

cc: Mayor and City Council
Sonoma County City Managers
Supervisor Mike Kerns
Rich Rudnansky, City Attorney
Mike Moore, Community Development Director
Mike Ban, Interim Director of Water Resources & Conservation
Steve Hood, Police Chief
Chris Albertson, Fire Chief

730

Mr. John R. Sansing
979 Golf Course Drive
PMB 164
Rohnert Park, CA 94928

March 29, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street NW, 9th Floor
Washington, DC 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino Project

To Whom It May Concern:

I am a union journeyman sheet metal worker with 15 years of experience working in the building trades in the San Francisco Bay and North Bay areas of northern California. Based on my experience with construction jobs similar to the proposed FIGR/Station Casino project, as well as commuting to job sites all over the Bay area, I have drawn the following conclusions regarding this proposal and its impact on the county in which I make my home:

- Construction and skilled trades jobs created by a project of this nature are short term, lasting six months to a year at most. Some of the speakers at the EIS scope hearing held on 10 March 2004 made similar observations; I concur with their assertions regarding the fleeting nature of these jobs.

- Only three sheet metal shops in the North Bay area have the capacity to fulfill a fabrication and installation contract for a project the size of the proposed FIGR/Station Casino project. It is likely that the sheet metal contract for this project will go to a shop in the East Bay or Sacramento area, providing no work or benefit for the local sheet metal shops and local sheet metal workers.

- The potential short-term local/regional benefit of these construction jobs, if any, are overwhelmed by the horrendous long-term impacts on traffic congestion on the US 101 freeway and secondary roads around the proposed casino site. As it is, many of my colleagues must be on the road by 4:00 AM to get to their job site. Getting home on Friday afternoons without a serious accident is already a challenge. Adding dozens or even hundreds of smoke-belching diesel busses filled with riff-raff on their way to play dollar slots at a cheesy Indian gambling hall every week will make the situation considerably worse. Time spent in traffic is time wasted, especially for construction, skilled trade and service workers. We cannot telecommute!

- Station Casino is under no obligation to use union labor for the construction and skilled trade work on this proposed project. They have been courting the union business managers to get them to endorse the project in an attempt to create a positive public image; however, if the project goes to bid (and I sincerely hope that it never gets that far), they can contract with any qualified provider for these services.

- A gambling operation, regardless of who/what is running it (or fronting it), is completely inappropriate for this area. Gambling does not create anything new. It does not advance

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knowledge or technology. It drains social and natural resources, resources that should be used to create healthy, beneficial enterprises. Gambling halls bring in an undesirable element and low-class, uneducated, frequently desperate people who cannot "do the math" to figure out that they being played. Southern Sonoma County is a quiet, mostly rural area; consequently, we have paid a lot of money for our homes here. We do not want the intrusion of riff-raff, addicts of various flavors and prostitutes in this area. It will ruin our quality of life and devalue our property.

- My residence, like most residences in the unincorporated areas of Sonoma County, uses a private well as its sole source of water. We already have problems with an unstable ground water supply and falling water table levels, mostly due to Rohnert Park's wanton and irresponsible orgy of building and water waste over the last 30 years. Our neighbor's well is unusable for six months out of the year; during these dry periods, our neighbor must have water trucked in and stored in a tank or borrow from our well. If Station Casino is allowed to drill and operate the wells it is proposing for their gambling hall project, they will drop the water table below the reach of most of the existing residential wells in use in the area. Is Station Casino planning on paying to deepen thousands of residential wells or install storage tanks on properties having a well rendered useless by their outrageous water consumption? Will they be required to compensate the owners of properties with wells in the region for the damage that they inflict on the water table? If so, they would find this ridiculous proposed gambling hall to be significantly less lucrative and desirable.

John R. Sansing

Miss Kirsten Barquist
979 Golf Course Drive
PMB 164
Rohnert Park, CA 94928

March 29, 2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street NW, 9th Floor
Washington, DC 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino Project

To Whom It May Concern:

I would like to respond to some of the verbal comments presented at the EIS scoping public forum for this project held in Santa Rosa on 10 March 2004.

Hugh Codding: As you could tell from Hugh Codding's performance at the public EIS scoping forum on 10 March 2004, Mr. Codding seems to have taken a long stroll down the path to senility. Mr. Codding's statement that he "cannot think of a better place" to build the proposed FIGR/Station Casinos gambling hall complex should be considered with a healthy dose of skepticism in light of his background and obvious ulterior motives for supporting it. Hugh Codding is the patriarch of Codding Enterprises, a corporation that has been engaging in construction and property management in Sonoma County for over 100 years. Hugh Codding and his construction juggernaut, along with other members of the local construction cabal, have been trying to build on the proposed casino site parcel and surrounding area for 30+ years. The only thing that has been stopping them is the Sonoma County general plan restrictions designating this area as a community separator and the endangered species status of the tiger salamander whose known habitat includes these lands. Mr. Codding et. al. are trying to bypass these local restrictions by using the FIGR's "sovereign nation" status to get these lands under federal trust and control. Once they have established a precedent for developing in this area and effectively wiped out the tiger salamander habitat, they can build with impunity. Getting the proposed casino parcel opened to development will greatly increase the value of Mr. Codding's land holdings adjacent to it. Of course he cannot think of a better place to build a casino under federal trust — he stands to reap significant direct financial benefit from the proposed project.

Speakers claiming to be union workers who lost their jobs to "outsourcing": This is such an obvious play to an emotional buzzword plucked from the media that it is almost laughable. Those who claimed to be construction and skilled trades workers who lost jobs to cheaper overseas labor seemed to have forgotten one little detail: it is not physically possible to send construction and on-site skilled trades installation work overseas. Further, it is not cost-effective to have building trades fabrication done overseas and then ship the finished product back to the United States. The only way these people could lose jobs to foreign competition is from illegal alien workers, a significant problem in general and for construction and service sectors in particular. Therefore, I conclude that either these speakers are extremely confused or they are phonies who were paid to read prepared statements at the public forum. Either way, they are not credible.

Kirsten Barquist

Kirsten Barquist

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Madrone Audubon Society

INCORPORATED

March 28,2004

Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington, DC 20005,

Subject: ``DEIS Scoping Comments Graton Rancheria Casino Project",

The Madrone Audubon Society, the Sonoma County chapter of the National Audubon Society with nearly 2000 local members, expects that data will be rigorously collected and all issues with their full impacts be considered in the proposed siting near the Laguna de Santa Rosa wetlands of a Casino Project by the Federated Indians of Graton Rancheria.

The following impacts must be addressed with appropriate mitigations developed to decrease the impacts to a less than significant level:

a. biologic resources
b. hydrology and water quality
c. geology and soils
d. night lighting
e. hazardous materials

The size and scope of this proposed project makes extremely careful consideration necessary. This environmentally sensitive area of the Laguna de Santa Rosa has site-specific issues of floodplain building and winter flooding, potable water availability for such a large ambitious project, waste water treatment and disposal adjacent to a flowing waterway and winter flooding, endangered species of plants and animals. Habitat impacts to be considered would also include night lighting and obstruction of animal movement along water "highways". The groundwater aquifer in the area used by existing cities is already at drawdown. This property is state-mandated recharge land for the water aquifer.

Again, the size and scope of this proposed project in an environmentally sensitive area makes extremely careful consideration necessary.

Sincerely,

Diane Hichwa, Conservation Chair,
Madrone Audubon Society, P.O. Box 1911, Santa Rosa CA 95402

Received 03-31-04 11:13am From-707 579 1182 To-2026327066 Page 001

733

To: Christine Nagle

From: Sebastopol City Council

RE: DEIS Scoping Comments,
Graton Rancheria Casino Project

City of Sebastopol
CITY HALL
P.O. BOX 1776
SEBASTOPOL, CA 95473
(707)823-1153
(707)823-1135 FAX

Linda Kelley, Mayor

9. Scale of the project to surrounding area. Consistency with surrounding land use. What are the viewshed impacts of this project? How will the light pollution be mitigated.

10. What alternatives/sites will be evaluated to reduce impacts?

11. What are the stormwater runoff impacts? Regional Water Quality Control Board will need to be consulted. The property has a Water District drainage canal running across it.

12. Future mitigation monitoring by the County will need to be done for many years. What will this monitoring include and who will pay for it?

Received 04-01-04 01:14am From-707 824 5759 To-2026327066 Page 002

2. Water availability- the SR plain groundwater/aquifer is already at drawdown. Sebastopol wells and aquifer could be impacted. This property is state mandated recharge land. What is the aquifer recharge analysis for this property? How much water is needed for this project and future needs if this project is expanded? What are the water rights impacts of tribal property? Who will monitor this into the future and will the Tribe allow access to monitor this issue.

3. Wastewater needs- what are the proposed wastewater and sewer treatment needs? Who will be monitoring this impact into the future and will the Tribe allow access for this monitoring?

4. Removal of 360 acres of prime agricultural land, within the County community separators, is inconsistent with Sonoma County's General Plan and smart growth principles. The proposed site is in the Williamson Act - agricultural preserve designation. What will be done to offset these impacts and will there be replacement property provided?

5. Economic impacts- loss of property/sales/transient occupancy taxes for this proposed project, as well as the loss of property/sales taxes if the project expands to other real estate/business as a result of this project. What are the impacts to local/regional businesses, restaurants and lodging. What are the impacts to other entertainment venues such as Luther Burbank Center, Spreckles Center and the Green Center. What are the cumulative economic impacts locally and regionally of this project? What are the impacts

Received 04-01-04 01:14am From-707 824 5759 To-2026327066 Page 001

Weems, Dorothy R

From: Jeito500@aol.com
Sent: Thursday, April 01, 2004 1:36 PM
To: dorothy_weems@nigc.gov
Subject: DEIS Scoping Comments, Graton Rancheria project

Dear Dorothy,

Thank you for talking my call. I have been frustrated. My computer crashed
and I cannot get my printer to work, but I wanted my comments included in the
discussion.

If there are any problems please call on my cell phone (707)484-6960

March 30, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 2005

Subject: DEIS Scoping Comments, Graton Rancheria Casino Project

I am writing to express my concerns about the impact on the environment that
the construction of the casino, proposed on the outskirts of Rohnert Park by
the Federated Indians of the Graton Rancheria, will have.

One aspect that I have not heard discussed is the effect that a workforce
sufficient to run a large casino, hotel, and entertainment complex will have on
the surrounding community. Workers will have a direct impact on the environment
through increased traffic, air pollution, possible housing demands, as well
as a number of other ways.

Station Casinos, contracted by the Graton Rancheria tribe, to act as its

management consultant, has extensive experience in running and staffing casinos.
The answers to many of the following questions must be explicit or, at least,
deducible from the business plan or from similar (even smaller) projects.

1. How many workers will it take to staff fulltime the casino, hotel, entertainment complex and any related or support businesses or enterprises?

2. How will the workday be defined? by shifts? by flextime?

3. If staffed by shifts, how many shifts? how many workers per shift?

4. When will the shifts be scheduled?

5. How will shifts affect commute, holiday, and normal traffic patterns?

6. If not by shifts, when will workers be clocked in and out?

7. Does company provide transportation to workers?

8. If so, what kind of transportation? buses? vans? other types of transportation?

9. Do the 15,000 to 20,000 vehicles the casino is projected to attract daily include employee vehicles? If yes, what is the estimate of employee vehicles in those numbers? If no, how many vehicles will employees add to those projections?

It seems that the preponderance of the positions created by the casino will likely be housekeeping, janitorial, maintenance, parking, and restaurant servers. Even if, these jobs are covered by union contracts they are at the low end of the wage scale. Affordable housing for these workers is very scarce either in the immediate area or the communities surrounding the proposed site.

10. Of all the workers hired, what percentage will be in the above occupational categories?

11. What housing needs are foreseen for these workers?

12. Will additional housing be required to be built for these workers?

13. Where will additional housing be built?

14. Will additional housing be over and above other already projected housing developments for Rohnert Park, for nearby cities, or for Sonoma county?

15. What effects will additional housing have on the local environment? water? air quality? further loss of open space?

16. How will additional housing get water, sewer, and sanitation services?

I believe a project of this size is absolutely mismatched to the site, the land use policies of the county, and the surrounding residential/agricultural communities. This casino needs to be located directly on the Highway 101 corridor, where customers can get there directly without meandering through urban, residential, and greenbelt areas. To this end I strongly recommend that the Graton Rancheria tribe and Station Casinos consider the site listed below.

Alternative Site

East of Highway 101, almost at the Sonoma/Marin county line there is a large tract of land that used to be a drive-in movie theater. This site is located in the San Antonio creek area. I believe this site will be extremely suitable. Moreover, there are plans to work on a nearby intersection. An exit

expressly
for the casino could be added to that project and the costs mitigated by the
tribe. In the end this will be a much less costly solution than mitigating all
of the problems with the current, designated site.

This site is also much closer to the metropolitan Bay Area where the casino
will draw most of its customers. This location will cut at least a half hour
off the trip. Please investigate this site thoroughly.

Submitted respectfully,

Thomas W. Scott
5130 Gilchrist Road
Sebastopol, CA 95472
(707)795-3087

DEIS SCOPING COMMENTS

GRATON RANCHERIA CASINO PROJECT

to

CHRISTINE NAGLE, NEPA COORDINATOR
NATIONAL INDIAN GAMING COMMISSION
1441 L STREET, N.W. 9TH FLOOR
WASHINGTON, D.C. 20005

from

Loretta Smith
P.O. Box 8434
Santa Rosa, CA 95407

April 1, 2004

RECEIVED
NATIONAL INDIAN
GAMING COMMISSION
2004 APR -1 AM 11:32

LAND USE AND PLANNING

This proposed project is in direct conflict with the Sonoma County General Plan which since 1978 has listed this property as Open Space, Agricultural, Community Separator.

+How will you prevent this project from violating Sonoma County's General Plan?

+How will you prevent the loss of this piece of land as agricultural/ open space?

The tribe and/or its partner has already approached surrounding properties with the intent to purchase them. If this land is taken into trust, there will be no law to stop additional acquisition of surrounding lands further decreasing the agricultural and open space and eroding the General Plan even further. There will be no limit on how the land will be developed.

+How will you preserve and protect all of the land intended as open space/.agricultural in the Sonoma County Genera Plan from development?

+How will you prevent a project of this size and character from disrupting the surrounding agricultural land use? The traffic and population activity are incompatible with the local dairies and farm equipment.

If a project of this size and scope is constructed, there will be substantial pressure from developers to buy up surrounding land and create commercial development the entire length of Rohnert Park Expressway, Stony Point Road and Wilfred Avenue.

+How will you prevent this proposal from directly or indirectly inducing substantial growth and development to an area that the voters of Sonoma County voted to protect as open space?

POPULATION AND HOUSING

A project of this size, and the traffic it will generate will necessitate substantial changes in the size of the surrounding roads.

+How will you prevent the existing housing, which is affordable housing in this county, from being displaced and destroyed to make room for road expansion?

WATER

The proposed site is a flood plain that regularly floods in winter. A project of this scope will significantly affect that flood plain and the surrounding properties. Pavement prevents rain from refilling groundwater. The casino will cover at least 50 acres of land.

+How will you prevent the loss of groundwater recharge capability and the resulting reduction in groundwater quantity that would otherwise be available for the public water supplies from the acres of buildings and asphalt?

+How will you prevent, when acres of fill dirt is brought in, the displacement of floodwaters on that site to surrounding properties?

+How will you prevent the change in the amount and direction of surface runoff

leaving the site?

+How will you protect surrounding neighborhoods and streets from being impacted by the floodwaters that have been displaced by this development?

The casino proposes to dig two deep wells. The water table under the site has dropped as much as 150 feet in the last 25 years. More water is already pumped out every day than is being recharged. Wells are going dry in Southwest Santa Rosa, Cotati, Penngrove, Sebastopol and Rohnert Park.

+How will you prevent this project from contributing to our serious water shortage?

+How will you ensure that surrounding communities and wells will not be impacted by the water usage of a project of this size?

AIR QUALITY

With 15,000 to 20,000 additional cars, tour busses and trucks 24 hours a day, 7 days a week, driving within feet of family residences and within a mile of the business district of a small city, air quality will be impacted.

+How will you prevent this project from contributing to worsening of air quality?

+How will you protect residents from exposure to hazardous gasses and objectionable odors caused by the volume of traffic and from the rise in pollution when busses, service trucks, brinks trucks and autos are stuck in traffic?

TRANSPORTATION/CIRCULATION

The local roads, Stony Point Road, Wilfred Avenue and Rohnert Park Expressway are already plagued by excessive traffic. With the 15 to 20, 000 additional vehicles on the surface streets leading to the casino, county residents will be subjected to increased gridlock 24/7, increased emissions, increased accidents and emergency delays. The city of Rohnert Park, located 2 miles away will feel this impact as well which will affect business. In addition, the state is not funding road improvements to cover this impact.

+How will you prevent the gridlock and excessive traffic on narrow country roads from an additional 10 to 20,000 vehicles?

+How will you protect the city of Rohnert Park from the traffic impacts of this project?

+How will you prevent highway 101 from the traffic impacts of this project?

+How will you prevent the cost of road changes as a result of this project from being born by the taxpayer?

BIOLOGICAL RESOURCES

The proposed site is at the head of the flood plain of the Laguna de Santa Rosa, the

largest freshwater wetland complex in Northern California. It consists of 250 square miles of watershed that helps sustain the entire Santa Rosa Valley ecosystem. (www.lagunadesantarosa.org)

The site is home and habitat for 5 federally recognized endangered species:

Sebastopol Meadowfoam (Limnanthes vinculans)
Burke's Goldfields (Lasthenia burkei)
Sonoma Sunshine (Blennosperma bakeri)
Showy Indian Clover (Tripolium amoenum)
and
California Tiger Salamander

+How will you prevent the loss of habitat from these endangered, threatened or rare species?

+How will you prevent the decrease in population of these species, which are endangered, threatened or rare?

+How will you address the loss of wetland, marsh, and vernal pools?

This site is directly in the path of the Pacific Flyway Migration Corridor and is used by scores of migrating birds for feeding, resting and nesting.

+How will you prevent the loss of area of the Pacific Flyway Migration Corridor?

+How will you protect the feeding, nesting and resting sites?

+How will you address the loss of habitat to the other animals that make this open space home; fox, possum, quail, skunk, coyote, egrets and field mice, just to name a few?

HAZARDS

In order to build on this site, acres of asphalt saturated fill material will be needed to prepare and raise the building pad. The high water table will cause these petroleum by products and other pollutants to leach directly into both the groundwater supply and into the Laguna de Santa Rosa.. New asphalt parking lots and driveways prepared by spraying oil directly onto newly prepared surfaces will further add to the contamination of this environmentally sensitive area.

+How will you prevent groundwater contamination from fill, asphalt and construction materials?

Paving over this land will prohibit rainwater from being absorbed into the ground during the flood season, causing water to be displaced and exacerbating an already serious residential and environmental flooding to properties in the area.

Residential septic systems will be under flood waters for extended periods of time causing additional failures of systems and leading to effluent surfacing. This will result in more wells in

the area becoming contaminated as sewage leaches into the floodwaters and flows across residential properties, roads and directly into the Laguna de Santa Rosa.

+How will you prevent contamination of wells or groundwater?

+How will you prevent septic failures from displaced floodwaters?

In addition, there will be significant increase from non-point source water pollution from oil, grease, gasoline, detergents and roadway runoff; and particulate matter from diesel engines from the 15,000 to 20,000 additional cars, tour busses and trucks expected to visit the casino 24 hours a day, 7 days a week.

+How will you prevent non-point source water pollution?

The land in question is near a World War II military site. There are concerns about hazardous materials left from that period.

+How will you determine that no hazardous materials, contaminated groundwater, or dangerous situations are present to harm those on that site or those living near it?

The casino will operate all hours of the day and night. It will sell alcohol. The area is known for its tule fog and narrow roads with wide ditches on both sides. Streetlights are little help in tule fog.

+How will you prevent an increase in drunk drivers threatening the community?

+How will you prevent an increase in driving accidents from the fog and narrow roadways?

NOISE

+How will you prevent an increase in existing noise levels from a 24 hour casino with 15 to 20,000 additional cars day and night?

PUBLIC SERVICES

U.S. News and World Report states that crime rates in casino communities are 84% higher than in non casino communities. A 1996 study by NGISC found that casinos actually create crime in their own and surrounding communities. Our county can look forward to increases in property crimes, assaults, white collar crimes, domestic violence, prostitution and narcotics. This will result in a need for new or added government services.

+How will you protect taxpayers from bearing the cost for additional fire protection?

+How will you protect taxpayers from bearing the cost for additional police protection?

+How will you protect taxpayers from bearing the cost for additional road maintenance?

+How will you protect taxpayers from bearing the cost for additional social services, as required because of alcohol abuse, gambling abuse, domestic violence, and financial problems?

The site will be tax exempt. This will decrease the property tax revenue that is needed by the local school district. (Bellevue School District)

+How will you protect the school from loss of tax based revenue?

UTILITIES AND SERVICE SYSTEMS

This proposed project will result in a need for new utilities and service systems.

+How will you address the need for power?

+How will you address the need for communications systems?

+How will you address the need for water treatment and distribution systems?

+How will you address the need for sewer/septic systems?

+How will you address the need for solid waste disposal?

+How will you address the need for local or regional water supplies?

AESTHETICS

The scope of this development is so great as to be invasive to the rural, country, quiet and scenic area. This is designated open space because the citizens of Sonoma County wanted landscape vistas, not developments. In addition to the 24 hour lights necessary for a casino, there will be excessive traffic on our country roads and people coming and going with trash tossed out of vehicles and onto our roads and yards.

+How will you maintain the quiet, rural, country open space aesthetics?

+How will you protect the area from the disturbing glare of lights 24 hours a day?

+How will you maintain clean, safe roadways with 20,000 additional cars per day?

MANDATORY FINDINGS OF SIGNIFICANCE

+How will you keep this project from degrading the quality of the environment, reducing the habitats of endangered plants and animals, or decrease its population?

+How will you prevent this project from achieving short-term goals to the disadvantage of long-term environmental goals?

+How will you prevent this project from having impacts that are cumulatively considerable?

+How will you prevent this project from having environmental effects which will either directly or indirectly cause adverse effects on humans?

OTHER POSSIBLE SITES

There are several other possible sites for this project:

Skaggs Island, a former military base that already has the infrastructure in place and would not require such environmental destruction.

A former drive in theater site at the county line between Marin and Sonoma. It is directly on 101 and has no residences near it.

Mecham Road, a landfill site is slated to close soon and be turned into a regional park. This site has many acres nestled in hills that would make it unobtrusive to the surrounding areas.

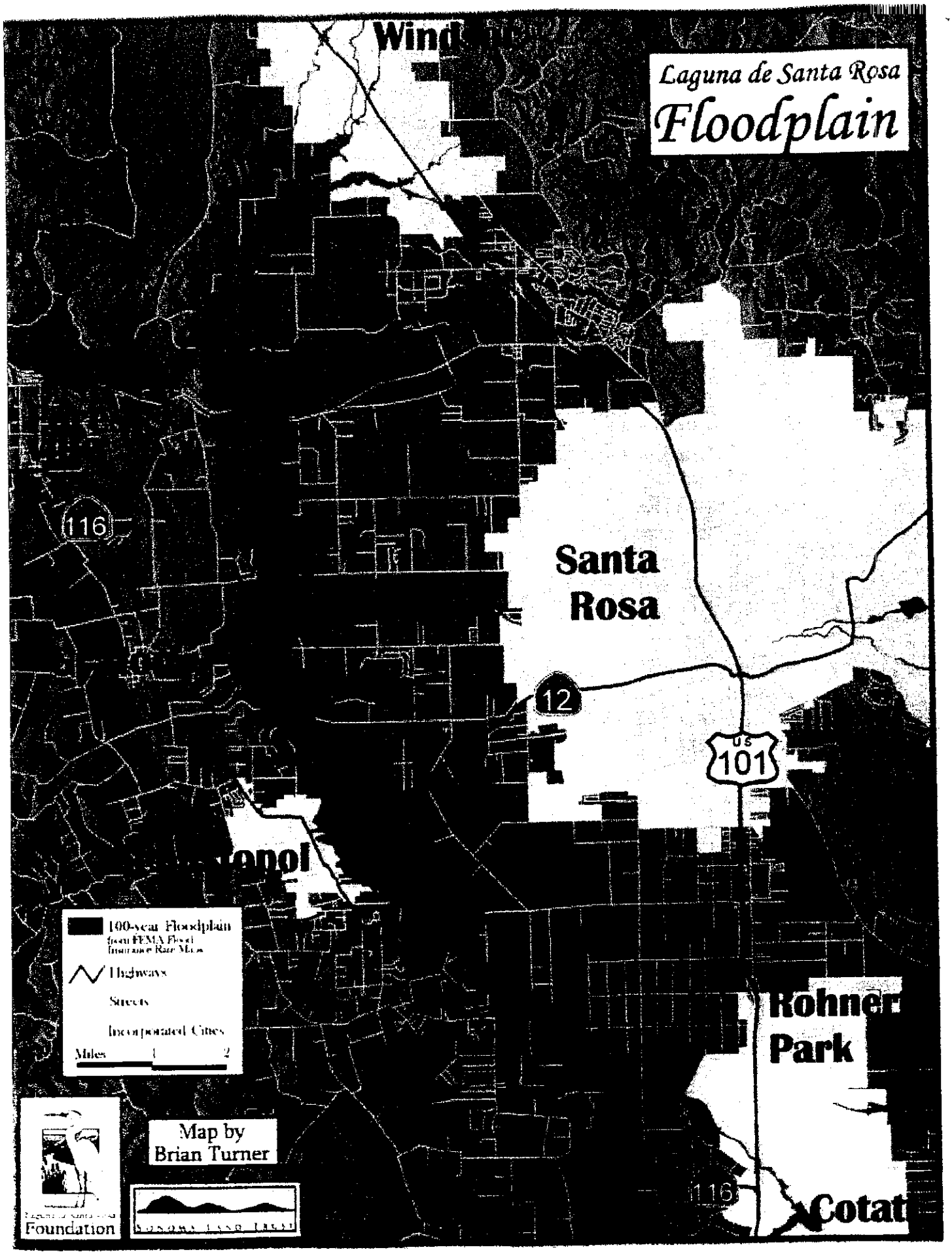
Hamilton Air Force Base, a former military site with infrastructure already existing. Located off Hwy 101.

Please look seriously at all these potentially significant impacts.
Thank you for your consideration.

jRespectfully,

Loretta Smith

attachments:
1. Photo of flooding on residential property
2. Map of Laguna de Santa Rosa flood plain


Laguna de Santa Rosa
Floodplain
Wind
116
Santa
Rosa
12
US
101
Rohner
Park
116
Cotat
100-year Floodplain
from FEMA Flood
Insurance Rate Maps
Highways
Streets
Incorporated Cities
Miles 1 2
Map by
Brian Turner
Foundation

Nagle, Christine L

From: RP Cotati [rpaccc@yahoo.com]
Sent: Thursday, April 01, 2004 12:12 PM
To: christine_nagle@nigc.gov; wanhini_bo@yahoo.com; coastmiwok@aol.com
Cc: gratonepa@hotmail.com; melissaelgin@hotmail.com
Subject: DEIS Scoping Comments, Graton Rancheria Casino Project (word doc with photos attached)

DEIS Scoping Comments, Graton Rancheria Casino Project

Additional written comments on the casino project should be sent to Christine Nagle, NEPA Coordinator, National Indian Gaming Commission, 1441 L Street NW, 9th floor, Washington DC 20005. Telephone number is (202) 632-7003.

Top of the letter should have the words, DEIS Scoping Comments, Graton Rancheria Casino Project.

Creek Related Environmental Considerations for New Developments Along RPAC Creeks

A fairly large number of new developments have been proposed or approved along creeks in our area, and although most will go through standard environmental reviews before permits are issued, some of the environmental considerations regarding the creeks may not be included in a standard review. In addition, some sources of information considered definitive and accurate have been found to be out of date and incorrect. Also, long term planning and current restorations on the creek system have not yet been made public, so it would be difficult to expect project planners to include these considerations in their plans, as they should. This is simply an informal communication for all concerned about issues we have come to find important that might not otherwise come to attention.

The very good news is that a system of creeks that was once wild and full of steelhead and salmon but then became little more than a network of poisoned drainage ditches has returned to life, is now being appreciated as the extraordinary 16 mile network of wilderness threading our urban areas that it is, and we are now planning with city departments, the water agency, and various local volunteer groups to preserve and improve the creek wilderness park system.

The bad news is that increasing urbanization has led to increasing flooding stresses on the creek drainage system as local rains fall on pavement or roofs that direct the water directly into the storm drain system and thence the creeks rather than allowing the rain to percolate into the soil. And, the rainwater and other water flows from parking lots and fertilized areas carries more pollutants harmful to the fish and wildlife in the creeks.

The challenge is to manage our entire urban system wisely so we can manage our creek wilderness parks wisely and enjoy them for years to come. Can humans and steelhead live in the same area? Are Tiger Salamanders doomed to extinction? Does living in a city mean you can only see nature if you drive 20 miles to a park or the ocean?

We'll see.

Barbara Greene

Creek Steward for Crane/Hinebaugh, Rohnert Park and Cotati Creeks Council (RPACCC)

=

DEIS Scoping Comments, Graton Rancheria Casino Project

Here are a few comments and a brief list of studies just completed or in progress that relate to the creeks adjacent to the proposed project. We have been working on the Creeks Master Plan for less than a year, so virtually everything is in draft form and subject to revision. However, much of the currently available published information is seriously out of date and therefore incorrect, so this short summary is an attempt to provide you with better information we may have right now. Hope it helps.

After Earth Day (April 21) we will be exhibiting many of these old maps and aerials at the Creek History and Science Exhibit in Bear Park and placing the reports in the library. Maps and aerials referenced here and many others are available on the internet at http://rohnertpark.bizhosting and at the Rohnert Park and Cotati Creeks Council site, http://groups.yahoo.com/group/RPACCC.

Background/Overview

For thousands of years, the urban creeks in the Rohnert Park and Cotati urban area were slow creek meanders in the marshy Santa Rosa plain (elevation 60-120 ft) that was once part of San Francisco Bay. The creeks were first artificially re-routed when the Northwestern Pacific Railroad was constructed in 1870, forming a dam across the gradual down-gradient flow which allowed surface water passage only at bridge locations. (Copeland Creek and Crane Creek were defined in this process.)

Then, for about 80 years, until Highway 101 was extended north to Santa Rosa, this area was primarily agricultural, so the creeks either meandered freely or were routed in drainage ditches along plowed fields. The highway again changed creek morphology as the creeks could only go under the roadbed at certain bridge locations. The environment was also changed by an extensive planting of redwoods and other trees along the freeway, so the highway noise and air pollution have been absorbed by these now 50 year old trees.

Urbanization after 1960 was very rapid, but the Rohnert Park general plan included provisions to keep the creeks as natural parks with bike paths on each side. The creeks were channelized and rerouted around developing land tracts, and were viewed principally as water drainage channels. The naturally stable creek sinuosity was replaced with severe jogs and straight lines. Impermeable surfaces like roofs, roads, and parking lots forced more and more water into the creeks through an expanding storm drain system.

Although the creeks flow mostly on land owned by the cities, the Sonoma County Water Agency owns engineered flood easements and owns some sections in fee simple. In most cases the bike paths along the creeks were planted and controlled by the city and are extensively and beautifully forested because of an early urban tree planting program followed by care and constant replanting. However, because flood control maintenance by the Sonoma County Water Agency included a policy of periodically clear cutting vegetation, dredging the channels, and then spraying to prevent new vegetation, the creeks became dead zones, generally walled off and avoided by residents.

After 1996, the Endangered Species Act and a finding that these creeks were historical habitat for endangered steelhead and coho salmon, channel maintenance

Flooding Issues

Because of rapid urban growth and numerous planned new developments, the adequacy of the current channels is in question. (Once considered inevitable, Los Angeles-style concrete channels have been rejected as an option.) Winter 2004 flood measurements by an Entrix fluvial geomorphology crew under contract to the SCWA and streamflow computer simulation programs should help clarify problems and facilitate solutions that keep the creeks natural. The Entrix report should be available in spring 2004. The City of Rohnert Park has just completed a storm water plan which is available from the Engineering Department. Various mitigation measures across the entire urban watershed and also required in new developments stopped flooding east of 101 in winter of 2004, but natural seasonal flooding west of the freeway occurred and should be expected several times a year in the future. It is currently felt that regular seasonal maintenance to clear clogged culverts and bridges of debris will prevent flooding east of the freeway, but that road closures a few days a year should become an expected part of life west of the freeway.

Ground Water Recharge

As this urban area is increasingly paved over, the natural ground water recharge formerly occurring in open fields now occurs in unpaved areas and in the creek beds. Most city wells, which provide about 60% of city water, are located along the creeks and draw on hyporhiec zone (underground) flows in the creek beds. (City Well #24 is on Crane/Hinebaugh Creek adjacent to this site.) Ground water availability and adequacy is the subject of much controversy and is currently under study by the USGS, but there is no question that the creeks must remain uncontaminated to provide pure water to city and private wells.

Relevance to Proposed Project

Because this very large 360+ acre site is adjacent to the industrial part of Rohnert Park west of the city and has been plowed for hay for years, the proposal to replant the creek areas east and south of the property as a natural riparian forest can only vastly improve the available habitat for steelhead, aquatic birds, and other wildlife. Inclusion of dry arroyos capable of absorbing winter flooding will also help mitigate upstream flooding problems and should offset any additional runoff created by structures and parking lots at the site.

We have been entirely delighted by the cooperation and enthusiasm for restoration of this site by the Graton Rancheria folks and welcome them back as neighbors to this small part of their ancestral lands.

= = =

- Kindest Regards, BG (who is solely responsible for hast and speed errors here)

For links and References, please see http://rohnertpark.bizhosting.com and http://groups.yahoo.com/group/RPACCC

Figures (http://rohnertpark.bizhosting.com and http://groups.yahoo.com/group/RPACCC):

Laguna De Santa Rosa

Creeks and Roads along 101

Casino Site

Satellite View of Rohnert Park and Cotati area and RPACCC creeks

Laguna de Santa Rosa Looking East From Stony Point Road [NCRWCB]

Sonoma Mountain Watershed Area

Creek ecotones, terminology

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Barbara Greene

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For thousands of years, the urban creeks in the Rohnert Park and Cotati urban area were slow creek meanders in the marshy Santa Rosa plain (elevation 60-120 ft) that was once part of San Francisco Bay. The creeks were first artificially re-routed when the Northwestern Pacific Railroad was constructed in 1870, forming a dam across the gradual down-gradient flow which allowed surface water passage only at bridge locations. (Copeland Creek and Crane Creek were defined in this process.)

Then, for about 80 years, until Highway 101 was extended north to Santa Rosa, this area was primarily agricultural, so the creeks either meandered freely or were routed in drainage ditches along plowed fields. The highway again changed creek morphology as the creeks could only go

under the roadbed at certain bridge locations. The environment was also changed by an extensive planting of redwoods and other trees along the freeway, so the highway noise and air pollution have been absorbed by these now 50 year old trees.
Urbanization after 1960 was very rapid, but the Rohnert Park general plan included provisions to keep the creeks as natural parks with bike paths on each side. The creeks were channelized and rerouted around developing land tracts, and were viewed principally as water drainage channels. The naturally stable creek sinuosity was replaced with severe jogs and straight lines. Impermeable surfaces like roofs, roads, and parking lots forced more and more water into the creeks through an expanding storm drain system.
Although the creeks flow mostly on land owned by the cities, the Sonoma County Water Agency owns engineered flood easements and owns some sections in fee simple. In most cases the bike paths along the creeks were planted and controlled by the city and are extensively and beautifully forested because of an early urban tree planting program followed by care and constant replanting. However, because flood control maintenance by the Sonoma County Water Agency included a policy of periodically clear cutting vegetation, dredging the channels, and then spraying to prevent new vegetation, the creeks became dead zones, generally walled off and avoided by residents.
After 1996, the Endangered Species Act and a finding that these creeks were historical habitat for endangered steelhead and coho salmon, channel maintenance was limited, so the trees, fish, and wildlife returned. (In the summer of 2003, the Bear Park Creek Pilot Project was begun after an extraordinary summer steelhead spawning run.)
In July 2003, the SCWA briefly returned to a policy of clear cutting the creeks, but a huge public outcry caused a change in this policy. Over a mile of Crane/Hinebaugh was chainsawed by jail crews contracted from the County Honor Farm and a thousand foot section of Copeland Creek was clear cut and bulldozed. Both creek areas have, however, been replanted by the agency, and the Bear Park area's half mile of new alders and maples are brilliantly alive with new spring growth.
Currently the cities, agencies including SCWA, and nonprofit creek groups in RPACCC are trying to develop a creek master plan that will enable flood control but allow living creeks in a 16+ mile urban wilderness park system. This challenging task requires everyone's cooperation but is gradually transforming the previously dead creeks into beautiful parks.

Creeks at the Site

Crane/Hinebaugh Creek (Hinebaugh Flood Channel) is east of the site and is joined by Cotati Creek, Laguna de Santa Rosa Creek, Washoe Creek, and Copeland Creek to form the main southern tributary of the Laguna de Santa Rosa. The Bellevue Wilfred Flood Channel runs northeast to southwest across the site, joining the Laguna de Santa Rosa near Stony Point Road. Because of increasing urban runoff, winter flooding occurs west of the freeway, but is being mitigated by various means.

Crane Creek, Five Creek, Hinebaugh Creek, and Copeland Creek

Crane Creek, Five Creek, and Copeland Creek carry water flows from the northwest slope of Sonoma Mountain into the Laguna de Santa Rosa. (Other creeks, principally Lichau Creek and Adobe Creek, flow south into the Petaluma River and San Francisco Bay.) Copeland Creek has been channelized and flows east-west across Rohnert Park, joining Laguna de Santa Rosa Creek west of Highway 101. Five Creek and Crane Creek, very large all-year creeks starting near the mountain summit, were both diverted into the Hinebaugh Flood Channel, which was originally a straight line channelization of Hinebaugh Creek. (Note: Creek names on available maps are often wrong.)

Laguna de Santa Rosa Creek and Laguna de Santa Rosa

The Laguna de Santa Rosa Creek originating in Cotati merges with other creeks at the southern end of the site but across the Rohnert Park Expressway. All these creeks then flow into the Laguna de Santa Rosa, which is gradually being restored after years of pollution by city sewage plants and agricultural runoff. The Laguna de Santa Rosa flows into the Russian River and is used by spawning salmon and steelhead migrating to the Pacific Ocean to and from the creeks.

Steelhead and Salmon (ESA)

Steelhead and salmon historically spawned in all these creeks and have been observed recently. Copeland Creek and Laguna de Santa Rosa Creek generally dry up in the summer, but the combined Crane/Five/Hinebaugh creek flows are year round so support a resident fish population that includes bass, steelhead, suckers, and mosquito fish. (Fish and Game surveys are very old and do not reflect current life in the creeks. The various published Russian River Bioassessment documents are also based on outdated information, so are also incorrect and are in the process of being updated.)

Flooding Issues

Because of rapid urban growth and numerous planned new developments, the adequacy of the current channels is in question. (Once considered inevitable, Los Angeles-style concrete channels have been rejected as an option.) Winter 2004 flood measurements by an Entrix fluvial geomorphology crew under contract to the SCWA and streamflow computer simulation programs should help clarify problems and facilitate solutions that keep the creeks natural. The Entrix report should be available in spring 2004. The City of Rohnert Park has just completed a storm water plan which is available from the Engineering Department. Various mitigation measures across the entire urban watershed and also required in new developments stopped flooding east of 101 in winter of 2004, but natural seasonal flooding west of the freeway occurred and should be expected several times a year in the future. It is currently felt that regular seasonal maintenance to clear clogged culverts and bridges of debris will prevent flooding east of the freeway, but that road closures a few days a year should become an expected part of life west of the freeway.

Ground Water Recharge

As this urban area is increasingly paved over, the natural ground water recharge formerly occurring in open fields now occurs in unpaved areas and in the creek beds. Most city wells, which provide about 60% of city water, are located along the creeks and draw on hyporhiec zone (underground) flows in the creek beds. (City Well #24 is on Crane/Hinebaugh Creek adjacent to this site.) Ground water availability and adequacy is the subject of much controversy and is currently under study by the USGS, but there is no question that the creeks must remain uncontaminated to provide pure water to city and private wells.

Relevance to Proposed Project

Because this very large 360+ acre site is adjacent to the industrial part of Rohnert Park west of the city and has been plowed for hay for years, the proposal to replant the creek areas east and south of the property as a natural riparian forest can only vastly improve the available habitat for steelhead, aquatic birds, and other wildlife. Inclusion of dry arroyos capable of absorbing winter flooding will also help mitigate upstream flooding problems and should offset any additional runoff created by structures and parking lots at the site.

We have been entirely delighted by the cooperation and enthusiasm for restoration of this site by the Graton Rancheria folks and welcome them back as neighbors to this small part of their ancestral lands.

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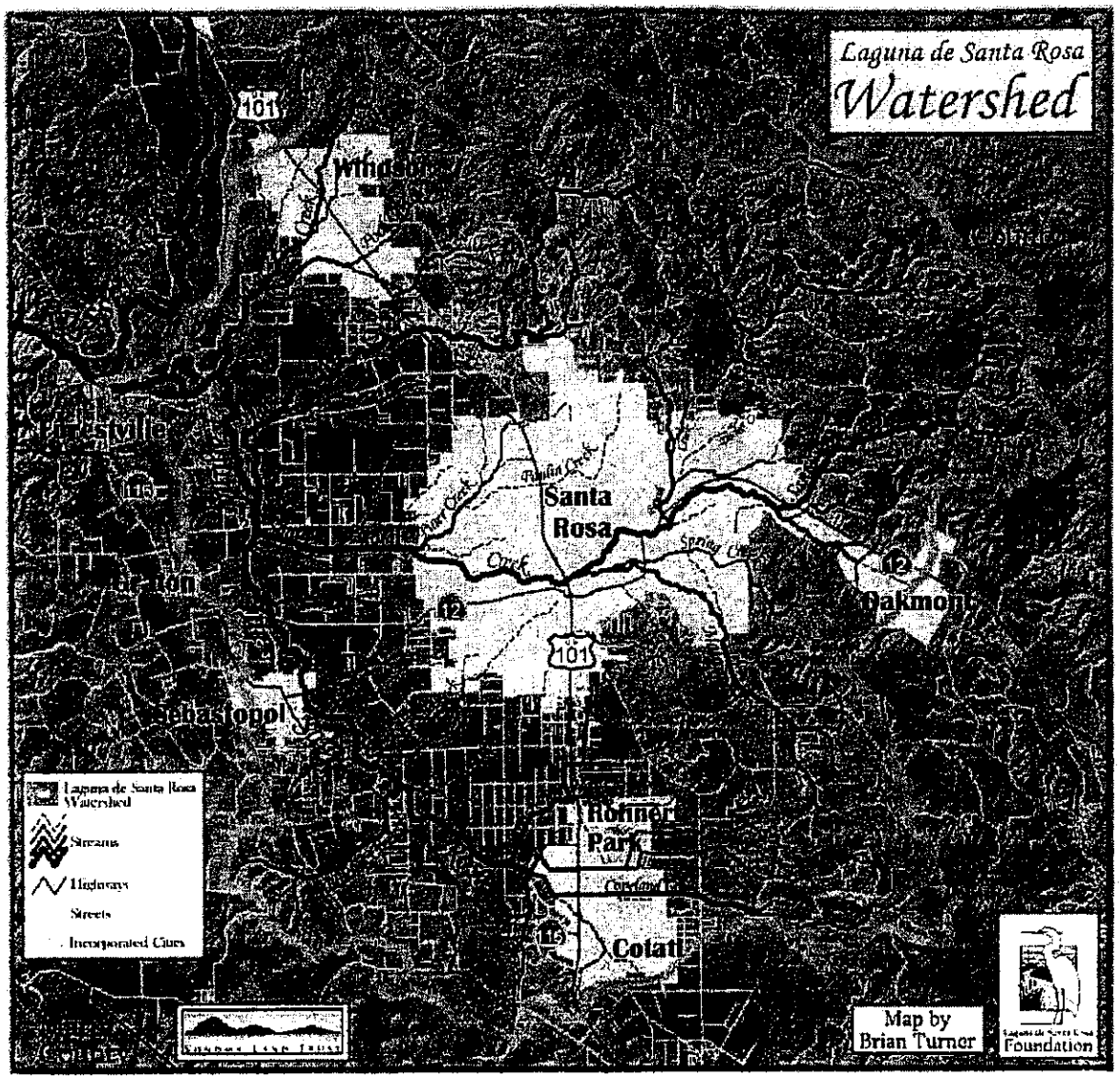
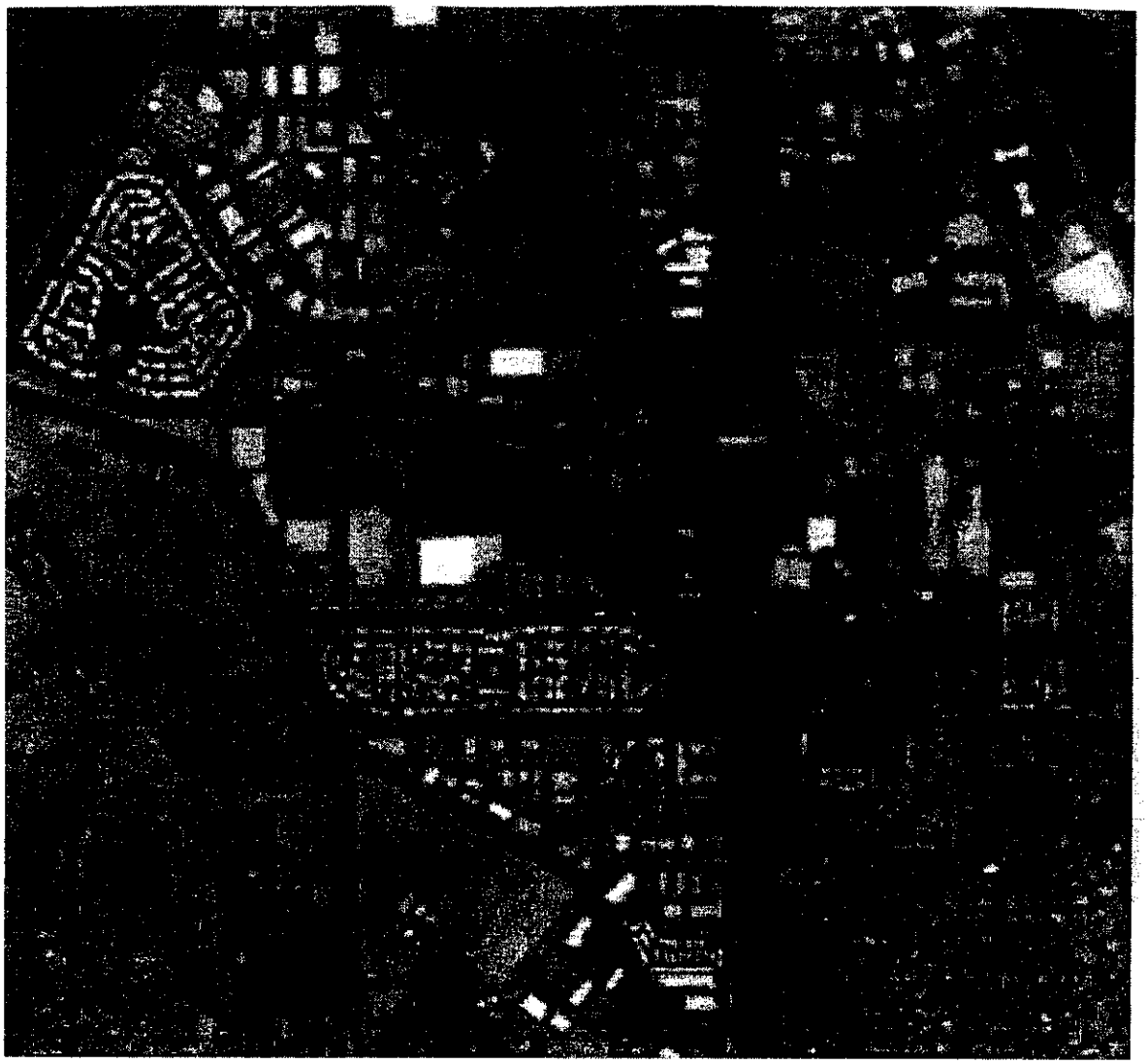
- Kindest Regards, BG (who is solely responsible for hast and speed errors here)

For links and References, please see http://rohnertpark.bizhosting.com and http://groups.yahoo.com/group/RPACCC

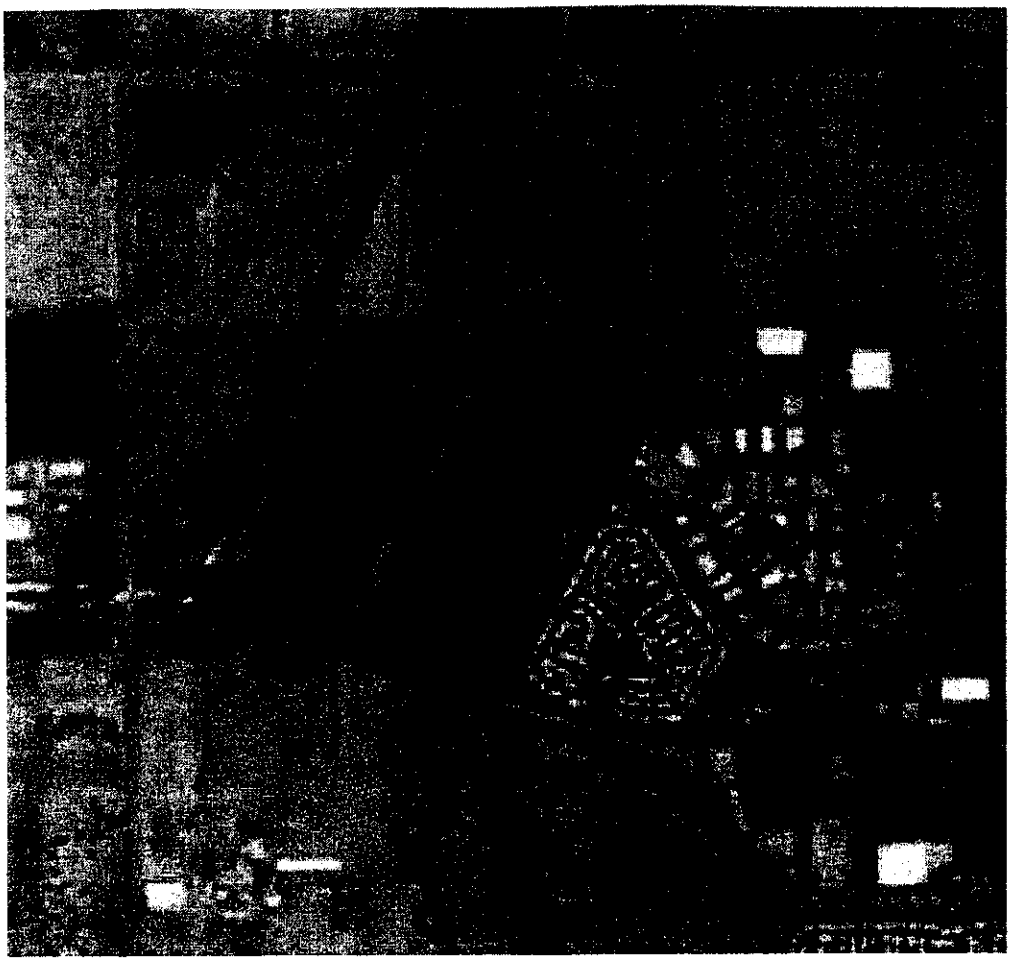
Figures (http://rohnertpark.bizhosting.com and http://groups.yahoo.com/group/RPACCC):



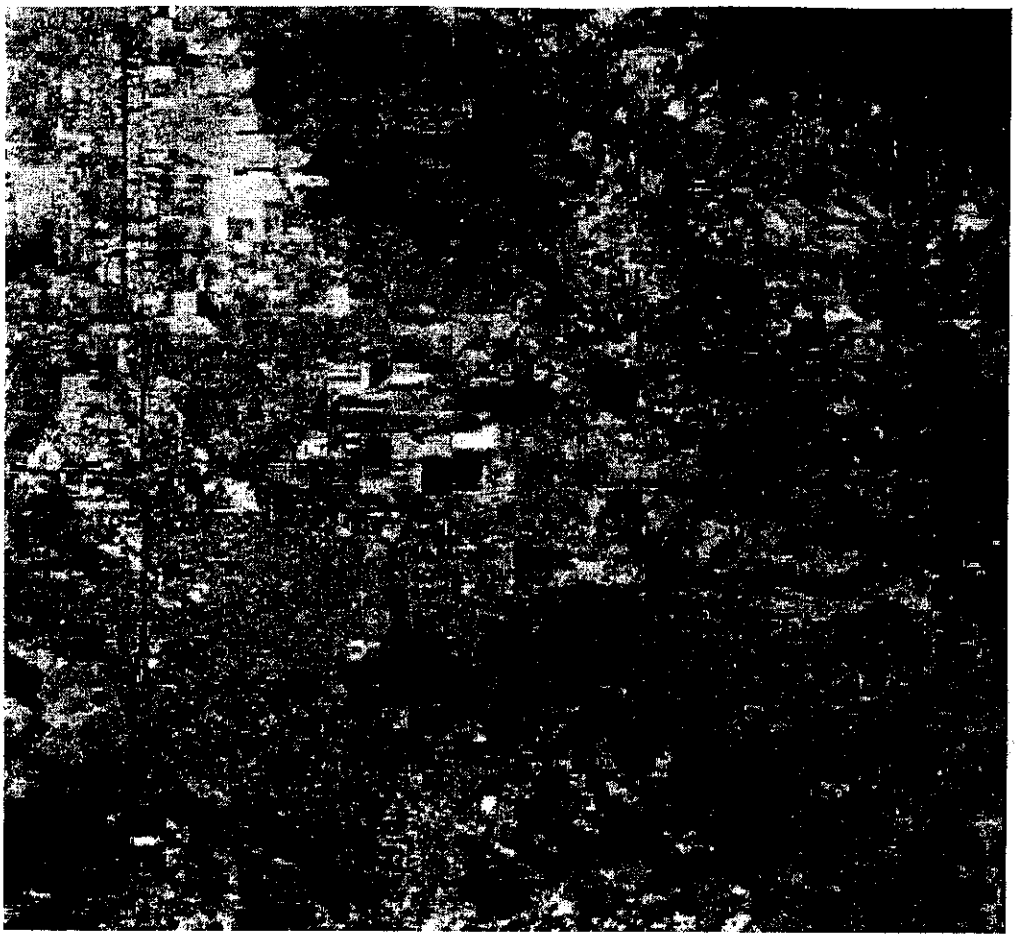
Laguna De Santa Rosa



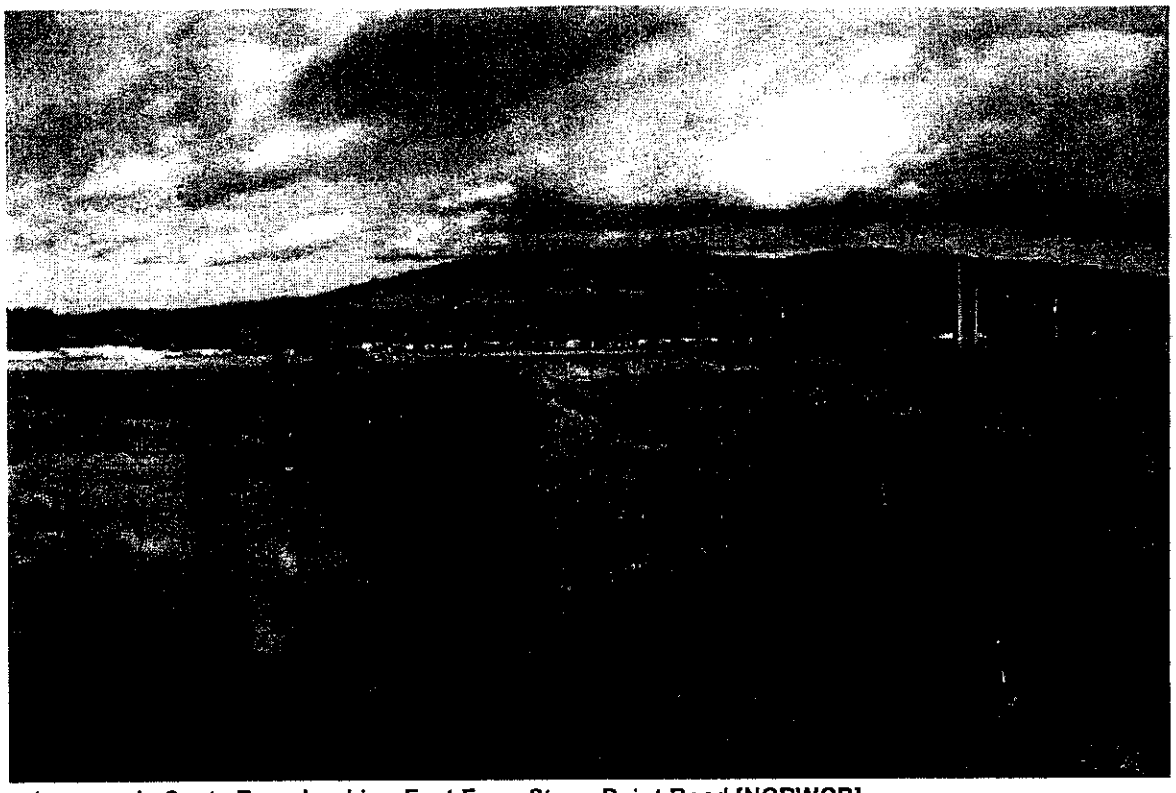
Creeks and Roads along 101



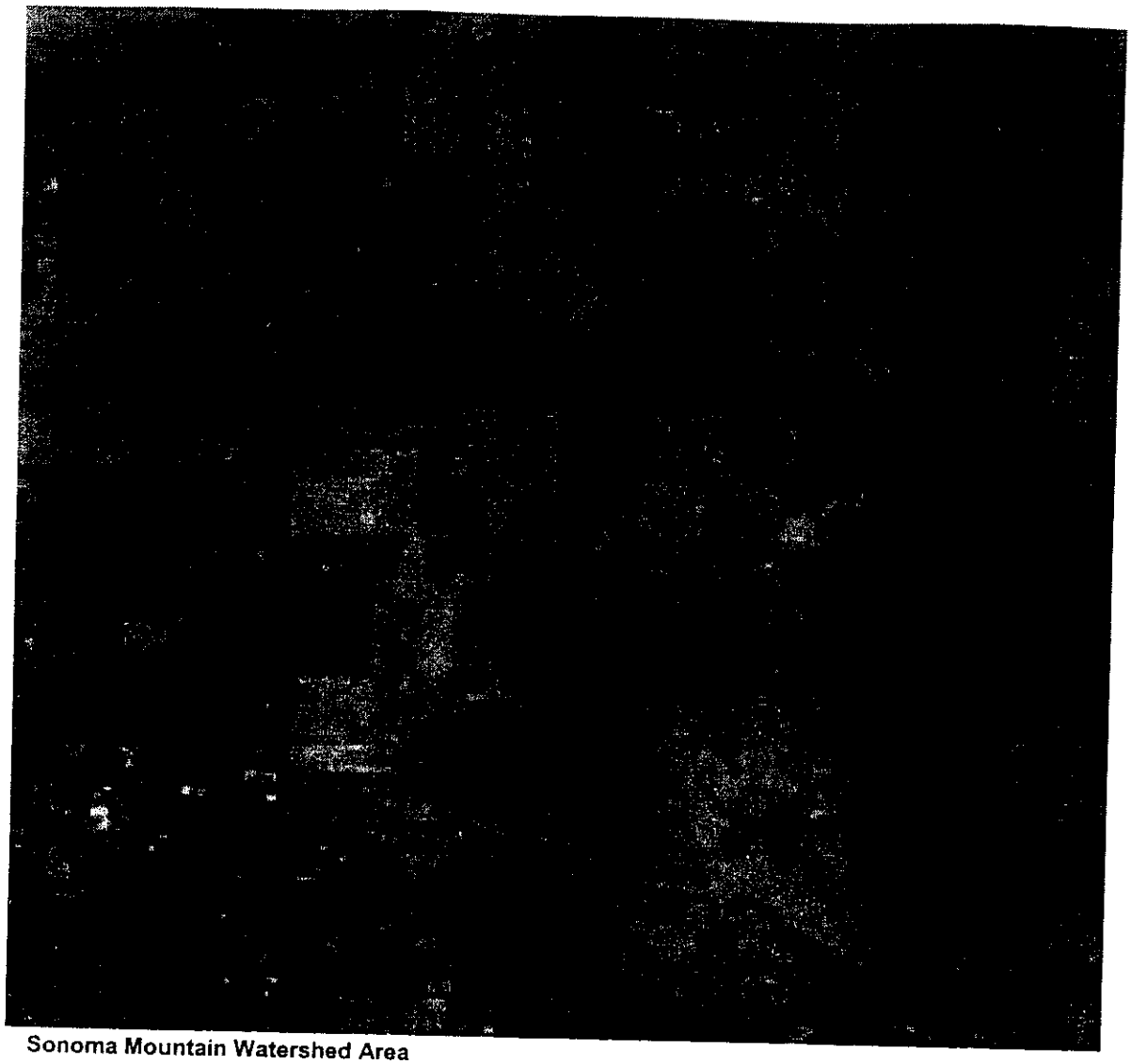
Casino Site



Satellite View of Rohnert Park and Cotati area and RPACCC creeks



Laguna de Santa Rosa Looking East From Stony Point Road [NCRWCB]



Sonoma Mountain Watershed Area

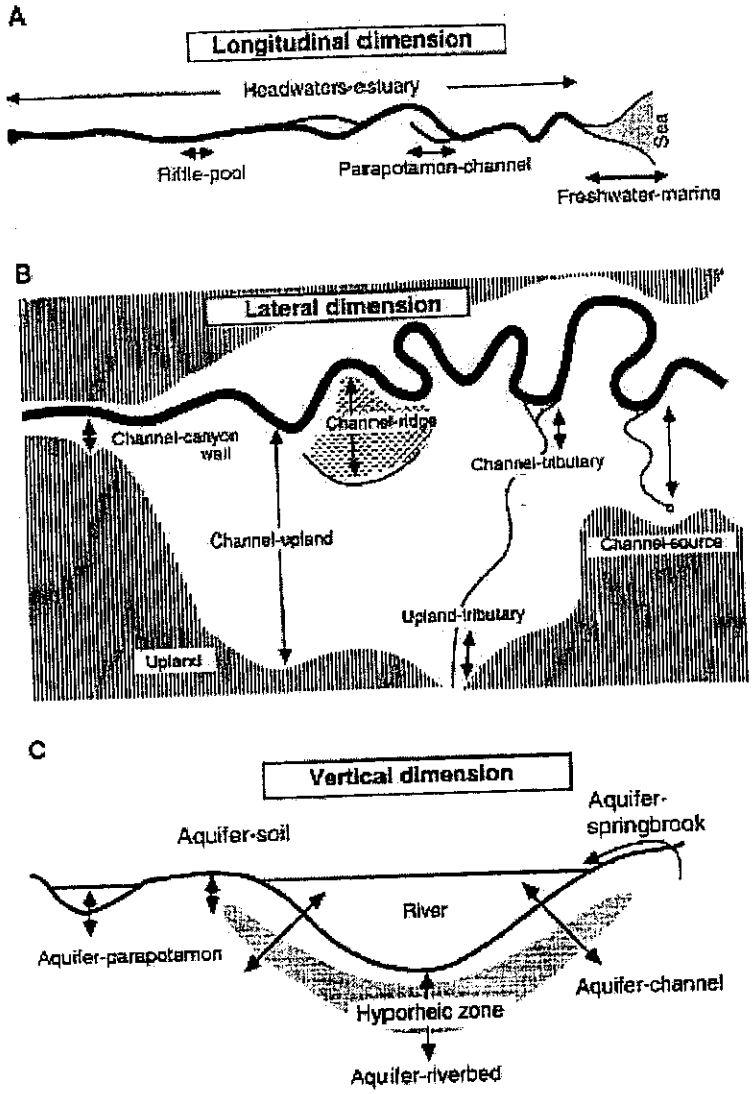


Fig. 2 Major ecotones and pathways of exchanges of materials, energy, and organisms in the longitudinal (A), lateral (B), and vertical (C) dimensions of a riverine system. From Ward & Wiens (2001).

Creek ecotones, terminology

DEIS SCOPING COMMENTS

Graton Rancheria Casino Project

To: Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W, 9th Floor
Washington, D. C. 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino Project.

Comments relate to specific items listed on NEPA Compliance Checklist (FWS Form 3-2185).

From

Lloyd Iversen
4230 Hargrave Avenue
Santa Rosa, Ca 95407-8311

3-28-04

Dear Ms. Nagel:

The following are my personal opinions, comments, and relevant information. I refer to the Casino Project, the related promoters of it, and the people, ideas, and plans for it as the "Casino Project" in the body of this document.

Dr. Jack Utter, who holds a doctorate in natural resource management and has additional background in history and law – including federal Indian law, explains the following relevant information in his book entitled "American Indians, Answers to Today's Questions": "What is the greatest single issue

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facing Native Americans in the future? The same one facing us all – the end of Nature. Without denying the seriousness of the many native issues that require ongoing attention, it is absolutely clear that, unless the planet's immense environmental problems are solved, all other concerns, save nuclear conflagration, won't matter. .....(Dr. Utter goes on) .....In early October 1991, Oren Lyons, and Onondaga elder, appeared in an interview on a segment of the CBS television magazine "Sunday Morning." Describing his concerns about environmental degradation, he first made the point that there is plenty of blame to be shared by "all of us." He went on to make a very graphic statement summarizing the effect of environmental damage on the future. He simply said, "We have taken our grandchildren by the hair, tilted their heads back, and slit their throats." This statement startles and even offends some people. But, unless the reality that caused its expression startles and offends them – and the rest of us – even more, we will continue to go precipitously down the road to virtual destruction of the world's biosphere.""

The county of Sonoma and its people have began an environmental movement years ago that has grown stronger and stronger. As a result of great labor and contemplation the County has created a general plan that begins the desperately needed process of preserving the land and the environment. These steps are probably too little and too late, but they are and important foundation conservation, and they make a start in the right direction. The Casino Project in question is proposed to be developed right over the designated community separator, green belt, aquifer recharge area, 100 year flood plain, sensitive Laguna environmental area that has been set aside in the county general plan. The County has made it clear that it doesn't want this site developed. The Williams Act also protects this site. So it is obvious that not developing this fragile site is in the best interest of the Native Americans and all others in the community.

I would like to also quote the Utter, Balen, and Cantu 1989 "The days of tea – and – crumpets conservation are over. We are talking about deadly issues here, issues that necessitate a most courageous, sweeping, and accelerated solution in order for the world's environment to be fit for habitation... The causes of the environmental crisis are well known, as are the solutions. Key social institutions, primarily national governments, lack the direction and high level of motivation necessary to implement solutions. It is therefore imperative, and exceedingly appropriate. That "We the People" of the

world's nations (including the Indian nations) begin to resolutely provide our leaders with the strong motivation and direction so desperately needed."

What these Indian leaders did not know at the time was that in the future a place like Sonoma County, an open diverse community of Indian and non-Indian peoples, would take their words so seriously as to implement a comprehensive general plan for the county that purposefully preserves special land. Now that land has become the target of the Casino Project for heavy-duty industrial commercial exploitation, development, and destruction. Why must this little scrap or land, one of the only scraps of land ever envisioned and protected, now be destroyed? Can't we just keep this one little piece of land? Can't we have this little place for birds and animals to live? Why must we turn every last place into a commercial industrial development? Why must the Casino Project slit the throats of our grandchildren?

I believe that the Casino project will come at a huge economic cost to Sonoma County in the long run. Studies prove this. John Kindt or the business department ant the University of Illinois says ".....For every $1 the casino brings into the state, it will cost the residents between $3 and $7 in hidden costs" (Economic Impacts of Legalized Gambling) How can this Casino Project prove that it will improve economic conditions of Sonoma County? The backbone of the local economy is small business, the 100 billion dollar wine industry, the 300 billion plus tech – telecom industry, and the agricultural industry. These entities depend on the clean, healthy image, and family atmosphere of Sonoma County that has attracted gems like Cisco Systems, Hewlet Packard, JDS Uniphase, Ocli, Unocal, Chevron, and the many world class famous wineries. Most of these companies have a capatilization far exceeding that of Station Casinos who has only 2.1 billion. The entire capitalization of Station Casinos, including all of their casinos represents less that 1% of the most viable businesses that already exist here. Why don't you find Cisco systems and Agilent Technologies in Las Vegas? Because who would want to live there? How can the county survive if it can't attract the best people and talent from all over the world? If the community separator and green belt is transformed into Las Vegas, will Sonoma County continue to be the destination of so many talented people who have the option to live anywhere they please? If Casinos are so attractive, then why is it that Reno and Las Vegas are considered to be so undesirable in surveys and studies? If casinos are so good for the community, why do Las Vegas and Reno have so many out of control social

and economic problems and corruption? How will this Casino Project be different?

I wonder if when the Rohnert Park City Council members, Station Casinos, big developers, and the Graton Tribe toasts with a bottle of fine wine over their confidential plans for a 2000 slot machine Casino, and if they ever discuss how they could include neighbors like me in a synergistic solution to the needs of all concerned? Since these groups have power and influence far beyond their formal authority, I feel it is their responsibility to look out in my best interest as well, and care for the weaker disadvantaged neighbors like me who live across the street or down the block. As they draw another bottle of California Rhone from their private wine cellar I wonder if they consider the 12 to 18 hour work-days that neighbors like me have put in 6 and 7 days a week, for decades, planting native trees and conserving the environment so that they can enjoy it? I wonder if they consider the socio-economic implications of causing my property to be eminent domain by the City to provide their Casino Project with utilities? I wonder if, as they draw the cork from an exceptional syrah, if they consider that the Casino Project will kill endangered animals and take birds on the pacific flyway, who depend on this land to feed and rest on their relentless journey, one step closer to final extinction?

I am a property owner adjacent to the proposed Casino project. I own 5 properties that are so close so as to be across the street or a block away. My existence here for the past 23 years is no secret to anyone in the local community.

It is impossible to identify public and agency concerns, and alternatives to be considered in the EIS because proper notification of the process, comment due dates, nature or the process, and public education, has not been made.

Information for an EIS cannot be gathered and socio-economic needs cannot be addressed because all of the local property owners, neighbors, public, and agencies have not been contacted.

The Casino Project has not demonstrated caution, vigilance, responsibility, presence of mind, concern, or sound judgment, in properly notifying or educating the neighbors of the Casino Project.

A wealth of relevant facts and information will continue to be unknown to the Casino Project, and crucial concerns will be omitted from the EIS, as long as this process of discrimination against neighbors of the Casino Project continues.

It is highly discriminatory in nature to never send out notices, letters, make phone calls, or visit door to door, the relevant neighbors of this Casino Project, while at the same time conducting a lengthy and in depth communication process with the City of Rohnert park to form a MOU.

The disadvantaged neighbors of the proposed Casino Project have been cast aside and deserted by the Casino project. Truly no effective inclusive effort has ever been made by the Casino Project or the City of Rohnert Park. Only if by chance I (or my neighbors) of the Casino Project scour the local newspapers and tabloids for hints and scraps of information concerning the Casino Project, do we even learn or even the most basic elements of the Casino Project proposal. The Casino Project clearly possesses the experience, skill, craft, and adaptability to inform their neighbors completely of all relevant alternative sites and all related documents, yet why have they not? If, as Jake Mackenzie of the Rohnert Park City Council has described, there are over 50 alternative sites available for further study and consideration, why have I, and my neighbors, been perpetually ostracized over such a long period of time so that we cannot make our concerns, comments, considerations, socio-economic needs, or unique knowledge a part of the process? How long will we continue to be the victim or this elaborate concealment of important documents based on who we are, where we live, and what our position in society is? This ability to keep things from the knowledge of others clearly demonstrates the Casino Project is discriminatory.

It is highly discriminatory against relevant neighbors of the Casino Project to not use effective forms of communication to inform and educate them of when various processes are taking place and when public meetings are taking place, while at the same time communicating and informing the City of Rohnert Park, developers, and other entities, with elegance, precision, and clarity.

Based on the actions of the Casino Project, it can only be concluded that relevant neighbors of the Casino Project have been systematically excluded from important processes.

Because the relevant neighbors of the Casino Project have been segregated into a unique group to be not communicated to, relevant neighbors have not had fair time or information in which to make careful timely comment, receive legal council, or react on a level playing field with other entities of the Casino Projects choice, such as The City of Rohnert Park, developers, and agencies. Since the relevant neighbors of the Casino project have been set apart from other people and agencies in the Casino Project scenario, I request that an investigation be made as to why this systematic process of discrimination has taken place for so long.

How is it that that hundreds of letters, E-mails, phone calls, meetings, and faxes have undoubtedly transpired between the Casino Project and the City of Rohnert Park, developers, and agencies, over a lengthy period of time, and yet never one letter, never one E-mail, never one meeting properly arranged, never one fax received by me from the Casino project? My phone numbers, fax numbers, addresses, and cell phone are available 24 hours per day. Every neighbor I have talked to is in the same predicament of being highly impacted by the Casino Project, while being unfairly segregated in this way.

The consistent segregation and separation between classes of people, has made my neighbors and me victims of conscious discrimination.

I made it known at a public meeting last August at the Sprecles Center in Rohnert Park, at which the Rohnert Park City Council, and the elements of the Casino Project hosted, that I was never given notice or informed of the Casino Project or even the very meeting that I was attending. Why after 8 months have I still not been notified? Since my property and trees will be destroyed and my septic will be damaged, and my happy home will be lost, why then am I not even included in the process in any considerate manner? There is no excuse for not notifying my neighbors or me of EIR scoping meetings, public meetings, comment due dates, alternative sites, full disclosure and plans for the proposed project, and all other documents in the complete scenario. There is no excuse for always harming my neighbors and myself by way of this consistent methodical omission of communication with my distinct social group. Why am I still a victim of this discrimination?

Why are my neighbors still victims of this discrimination? How long must we continue to be disadvantaged in this process and kept off of a level playing field because who we are and where we live? Why shouldn't we have complete and full access to documents and information about a Casino Project that has such a profound impact on, and is likely to destroy, our long established way of life, our social structure, our families, our economics, our culture, and our values? Why are we under attack for our customs, values, and way of life, occupations, liberties, and culture based much on where we live and who we are? I believe that from a socio-economic viewpoint, if my neighbors and I lived in Fountain Grove, Rincon Valley, or Mill Valley California, we would have been given at least a phone call. Why are we less important than other people? There are many grievances that have come about from the bias against my neighbors and myself. How can the relationship between community and the socio-economic impacts of the Casino Project ever be addressed as long as this process of segregation persists?

To fairly demonstrate the intention of, and in order not to continue to be discriminatory or manipulating, in gathering information necessary for preparing and EIS for the proposed Casino Project, the Casino Project, NIGC, and other relevant agencies need to form a list of the neighbors and contact them in letter form, fax mile, or even a courteous phone call. Then a full disclosure of all meeting notes, agendas, plans, name contact lists, vocalized opinions and comments of officials, and other documents need to be presented in their fullness to myself and my neighbors. By systematically keeping neighbors uneducated and disadvantaged in the scooping and development process of the Casino Project, neighbors have clearly been denied access to the processes. How can I, or my neighbors, comment on the process or be included in an effective way, while regularly denied the same type of rich communication that other people have received all along? I can't my neighbors or I be at least treated like any other land owner, developer, council man or woman, Native American, or Organized Casino entity? There fore I request that all of the hundreds of letters, E-mails, phone calls, meetings, and faxes that have been made between the Casino Project, the City of Rohnert Park, developers, and agencies, over a lengthy period of time, be made available to the neighbors of the Casino Project for review. I also request that a history be written and explained to my neighbors and myself pertaining to the chronological unfolding of secrete closed meetings, open meetings, and planning sessions between the relevant parties of the Casino Project. These documents should no longer be kept secrete from my

neighbors or me. As a direct result of the discriminatory behavior of the Casino Project, The City of Rohnert Park, developers, and agencies, I lack facts concerning the plans or the scope of the proposed project, except for the incomplete descriptions contained in local newspapers or by hearsay. This unfair bias has distinguished myself and the neighbors of the Casino Project, as a distinct group, set apart from others, such as The City of Rohnert Park and developers who may be Hugh Coding, Jimmy Rogers, Clem Carnelli, Dennis Hunter, James Ratto, Sonoma National Bank, North Bay Disposal, and a broad group or other possible entities and off book entities. As part of a distinct group, which has been depressed, discouraged, and denied fair due process, I have not been made aware or any alternative sites or studies relevant to this Casino Project. How can I create a comprehensive EIS scoping document or response while being discriminated against?

It is amazing to me that a project that will have a permanent profound effect on my family and my life is not made known to me by standard methods of direct communication, and that I am never communicated to by members of the Casino Project, the City of Rohnert. I am not unique in this communication blackout. I have yet to meet a neighbor or property owner, who has been contacted in any way. The off hand ways I have learned of these events, does not allow sufficient time for preparation or letters, responses, speeches, or arranging for legal council or baby sitters to take care of my children while I run around at the end of a 16 hour work day trying to find out facts that the Casino Project should already be making available to me. It is completely inconsiderate, and clearly demonstrates bad will, that direct neighbors of a project of this magnitude can be systematically kept in the dark about this issue. As a property owner I have never been given a fair chance to comment on the project. I have been a victim of segregation and my property rights have been violated. When I learn of a meting by reading the paper the day before the meeting takes place I have no time to prepare my comments. This has consistently been the case of unfairness on the part of the Casino Project. Station Casinos was given every opportunity to make presentations as were also the entities related to the Casino Project. I, on the other hand, had to miss work and prepare comments in less than 24 hours. At the meetings I was only given 3 minutes to make any comments on this vast subject, yet pro-casino speakers were regularly allowed far more time and attention. If I am always discriminated against, and not allowed to make even the most elementary statement at a public hearing, then how can the issues ever be properly addressed from a

socio-economic point of view? If I am forced to come unprepared and speak in public and made to feel uncomfortable by the heckling of the pro-casino crowd, how can I overcome this huge disadvantage? I don't appreciate comments saying that I am a "smug and comfortable white folks" Since I am never notified of any of the related events as they occur, I am at a great unfair disadvantage to take a stand for my basic rights as a property owner and member of the community. Further, members of my neighborhood, and I, feel threatened by the zealous stifling and stereotyping of us. We are victims of threats to the free speech of anyone who disagrees with the Casino Project. At a recent public hearing a pro-casino speaker implied that Santa Rosa High School students passed time in the afternoons by shooting Native Americans with fire arms for fun. Why do I have to be subjected to this type of inflammatory commentary at a public hearing that is supposed to be about environmental issues? Why are my human rights, not zealously protected by the Sonoma County Human Rights Commission? When I have been targeted by hate speech and racism, why is the subject suddenly not important? Shouldn't I have the right to post a "no Casino" sign on my property without being continually vandalized and stolen? Shouldn't I be able to hand out a simple flyer about ground water concerns without being screamed at? I consider this behavior of pro-casino peoples to be indirect prejudice at the very least as one neighbor said after reading the intimidating article in the Press Democrat 2-18-04, "you better not say anything against the casino now!" This typical behavior is emotionally disturbing and intimidating. Some of the comments made to me because I disagree with the current Casino Project, make my skin crawl. I will not write them here because they are so hateful and vulgar in nature. Neighborhood generated information flyers and signs have been the targets or regular vandalism. I feel afraid to even post a simple sign on my property of hand out a flyer because of the hostile tone set forth by the pro-casino entities. Can you expect me to feel anything but threatened, when my comments and information are regularly cut short at every public meeting? Can you expect me to feel anything but discouraged and down trodden when pro-casino speakers are allowed to slander and insult anti-casino speakers at public meetings? It is damaging to my neighbors and me, when miss-information is presented at a public presentation by pro-casino entities regarding the likely effects of increased traffic. What right do the Casino Project people have to come into my community and present information-information that misleads people in favor of a Casino Project? I suggest that you review the studies regarding casinos conducted by the University of Chicago Illinois. These un-biased studies paint a very different picture of what the socio-economic

reality of a casino across the street from me will be. Are these studies false? Can the Casino Project produce studies that negate these studies, which have been frequently referred to during open public comment at various meetings, by the Krive family of Petaluma?

In public meetings the Casino Project has made it clear that it will hire only Union labor in the construction and operation of the Casino Project. This blatantly discriminatory and damaging to my businesses which are not union and will not be considered for any of the economic benefits of this project. Many statements made by the Casino Project imply that any business, which is not union, pays poorly, does not provide a decent way to earn a living, and has no benefits. This is false and inflammatory rhetoric. My non-union business pay above union wages and provides better benefits and job security. This type of slanderous sounding speech damages the image of non-union businesses. Most business in the county is non-union. Why should the community tolerate all the negative effects of a Las Vegas style casino and not get the contracts, jobs, or other perks? Why should I be forced to compete with the Casino Project business entity that has unfair advantages over me? Why should I have to compete with someone who is barely regulated and pays no taxes? It is therefore likely, that the Casino Project will damage me economically.

My comments and related information are submitted in opposition to the proposed Graton Rancheria Casino Project (the "Casino Project"). This Casino Project will have many environmental impacts on my properties, family, tenants, and agricultural activities. I see no feasible method of mitigating these impacts now or in the future. Some of these impacts center around air pollution, noise pollution, altering the natural course of water flow, flooding issues, traffic, sewage treatment and disposal, destruction of the natural beauty of the countryside, and the insufficient water supply to accommodate a project of this magnitude. It is a fact that the water supply does not exist to make the Casino project function. The water supply for the area is in a crisis of extreme overdraft. This crisis has been acknowledged by the Sonoma County Water Agency and the City of Rohnert Park, as well as many other public agencies. Why should decades of my hard work growing trees to enhance the environment and enhance the landscape end in my well going dry because a Casino Project competes with my well and renders it useless? Without water my plants and gardens cannot survive.

I have personal knowledge of the depletion of my private wells for 23 years. Even despite my and costly extensive water conservation and careful planning and use to minimize impacts on my private wells, the water table has proved to be in extreme overdraft and dropping rapidly due to huge industrial style wells placed near me, that have enabled Rohnert Park to expand and grow un-checked. The local city and industry populations are using water far in access of current or future water supplies. For my private use, farming, and my tenants we use less than 72,000 gallons per day on the heaviest use days of the year during peak conditions. At this rate my land would have a perpetual water supply. However due to the competition of urban sprawl and other industrial users, my water levels continue to drop. This is not a sustainable scenario for water use. The addition of the Casino project will compound the problem for which there is no current solution. Until the current problem is completely resolved it should not be compounded.
I am concerned that the bucket tests for Salamanders were not conducted properly at or near the Casino Project site. In monitoring this study I noticed the sloppy inconsistent construction of the bucket traps. I also noticed the continuous destruction of the animals trapped by predators such as raccoons and birds. I also noticed the purging of these traps by anonomous vehicles in the wee hours of the morning on a consistent basis. I believe that the study of the Salamander has caused the devastation and death of hundreds of these animals and has violated the principals of the Department of Fish and Game. How can we trust any study in the future for the Casino Project, when this type of behavior is already surfacing?

I have personal knowledge and can testify that within the last several years of planting trees and tilling the soil on my farm lands I have found spent and unspent military machine gun shells. I hear from elders in my community that large amounts of military chemicals and weaponry lie within the Casino Project area. Unfortunately, because the Casino Project does not peruse this un-written knowledge base responsibly, these crucial facts go un-explored. In addition there are chemical tanks and improperly decommissioned hazards that need to be addressed relative to the Casino Project.

Soon my young children will be taking the bus to school. Since we live in the country now, that means that they will wait on the corner for the bus to come. The Casino Project will bring over 10.000 additional vehicles per day to my streets and drunken drivers as well. Police Chief Chuck Bollen of Tunica Missippi says, "arrests for drunken driving have increased 500%"

...after a casino opened. (Newsweek November 1998. US News and World Report said "…. crime in casino cities is roughly 84% higher than the national average" Why must my children be victimized by the probable impacts of the Casino Project and placed in great danger?

This Casino Project has the predictable possibility to cause injurious and damaging impacts to the human environment and my family.

This Casino Project has the predictable possibility to cause injurious and damaging impacts to the socio-economic needs of my neighbors and myself.

Before you take any action with regard to the Casino Project, your agency should review, at a minimum, and in detail, the following documents relating to the prevailing local and countywide water supply structure, scheme, design, development, and history:

1) All documents suggested for review by Weston Benshoof Rochefort Rubalcava MacCuish LLP and the O.W.L. Foundation in their "DEIS Scooping Comments, Graton Rancheria Casino Project" dated March 10, 2004 and submitted to you.
2) All "DEIS Scoping Comments, Graton Rancheria Casino" documents submitted to you by Pamela A. Miller.
3) All documents from the Convention on the Conservation of Migratory Species September 18 – 24 2002, as well as subsequent meeting documents and policies. Among other things, it is important to note in this documentation the importance of wetlands in the functioning of the Pacific Flyway.
4) "The Ramlet Report" prepared for the County of Sonoma, and the references included in that document. Especially important in this document, among other things, is the validation and observation of ground water transients. This indicative special inherent characteristic of the water table at the Casino Project and adjacent lands, suggests that I will be impacted by pollutants transmitted in the perched water table, and that seasonal ground water transients in the perched water table are large and extensive. I have personally conducted tests and studies of the ground water transients and documented them in public record across the street from the Casino Project site. There fore I am currently one of the best experts on this matter and know well what the nature of the problem is. It is therefore likely that I will be directly impacted as

pollutants are conducted below ground in the ground water system. The water table is complex here, in that it experiences extreme transients in the flood years. The Casino Project is located directly over the designated 100-year flood plain. The soil matrix consists of a matrix of no consistent pattern of sub-alluvial fan deposits of heavy adobe clays, zone one, zone two, and zone three type soils, gravel beds, very pure sands, as well as faults and areas of isolation. The net result is that this geological unit cannot be considered uniform or predictable in nature. This type of geological unit cannot be scientifically analyzed to predict location, direction, or depth of conduction of pollutants from the Casino Project. Therefore any conclusion drawn from any study of ground water will be inconclusive and unreliable in predicting the effects of the Casino Project on ground water and the waters of the State of California. What is known is that the unique properties of this prime aquifer recharge area make it highly conductive, and yet at the same time there are unpredictable areas of isolation with artesian pressure from unknown sources. Since the area in question cannot be adequately tested and studied to predict effects of a Casino Project on ground water, and the science of such predictions is imperfect and unreliable, it is a fore drawn conclusion that the Casino Project cannot take place on the proposed site, and that other alternatives will need to be explored.

5) All County of Sonoma health department records for percolation tests and ground water readings. Among many important factors, one of the key factors of this body of documents is that percolation rates and soil profiles meticulously taken over a period of decades clearly proves that there is no consistent pattern or soil type in the area from which to generate a model for the probable disruption of the natural course of water, as a result of the Casino Project. If there were predictable soil types, relevant mapping, and relevant documentation, the Sonoma County PRMD could simply look at the data and tell a property owner where and how to construct every private waste disposal system, or whether it could be constructed at all. Although this body of documents probably represents one of the greatest and detailed records of information regarding the conditions in the Casino Project vicinity, it only reflects descriptions of soil conditions approximately no more than zero to 14 feet deep. Since rumor (remember I have no real source of facts on this project because of I am a victim of the Casino

Projects on going discrimination) says that very deep wells will be drilled on the project site, and the project will have on site waste disposal equipment and extensive irrigation equipment, it follows that there will be no way to construct a reliable model of probable effects of the Casino Project on the waters of the State of California.

6) All well driller logs from Sonoma County well drilling companies. This is an important body of documents to review completely. Of particular importance in this body of documents, private and public, is the fact that clear proof exists of sub-alluvial fan deposits existing from surface levels down to the deepest readings on drilling logs, which are sometimes many hundreds of feet deep. At depths of hundreds of feet it is not uncommon to encounter a riverbank or a redwood tree preserved in the ancient aquifer. I know of a tree found at a depth of about 1700 feet in the Casino Project vicinity. I also know that there is a huge danger in perforating upper water tables that private residences use, and hence draining them to lower water tables by large wells acting as conductors. The subaluvial geological formations are highly conductive in nature. The unpredictability of the location and existence of these features, and the impossibility of accurately mapping them, further determines that a reliable model of the probable effects of the Casino Project will be impossible to formulate. The effects of the Casino Project there fore are impossible to predict. Since water recourses are the basses of the entire socio-economic structure in Sonoma County, including the Graton Tribe, don't risk degradation of water resources by this Casino Project. It should be noted that well driller logs are private and any study will not have access to all of the records. There fore crucial facts would or could be omitted from any study or model of the likely or probable effects of the Casino Project. With crucial facts omitted from a study or model, the faulty study or model is likely to lead to false conclusions and recommendations. Ultimately the waters of the State of California will be placed at risk.

7) Roma Gans' book "How do birds find their way". Especially relevant to this document is the fact that the Casino Project is to be placed on the primary route of the pacific flyway. This natural habitat is an irreplaceable resting and feeding place for many

migratory birds on the pacific flyway. Many birds use the same nests year after year. This phenomenon is only coming to light by science at this time and needs much more study and exploration. What we do know is that if we continue to harm the Pacific Flyway we will disrupt the macro genetic cycle of gene pool enrichment that keeps thousands of animal communities healthy enough to reproduce, and to survive genetic defects and disease. On most any day of the week any talented biologist can observe this phenomena in action. Birds have used the lands of the Casino Project since time immemorial and therefore, the Casino Project is incompatible with the fragile ancient eco-system.

8) Life cycles of the 100-year flood plain upon which the Casino Project is proposed, are very long in duration. The typical duration is 100 years as far as current science can extrapolate. The 100-year flood plain is poorly understood, and takes decades to study. I suggest that at least several flood cycles be studied prior to any Casino Project decision-making relative to this site. This flooding is at the top of the Laguna matrix and affects the entire body of water. This study should include all aspects of the natural course of water as well as all of its effects on the symbiotic relationship between risonuculi found on native plant root matter. The sustainability of native plants will be jeopardized by the disruption caused by the Casino Project, of the natural watercourse. The 100-year floodplain or "zone" plays a crucial role in the health and survival of the entire ecological structure and, with out it, the native plants, insects, and animals will not survive. These creatures are at the base of the food chain and must be protected. The science of this subject is in its infancy and poorly understood. This Casino Project site has been a military dumping ground and a chemical dumping ground. I have personally found spent and un-spent machine gun shells in the area when digging to plant trees or service septic systems. A complete study of all the related information to the military activity needs to be undertaken. These unstudied, unpredictable, and poorly understood hazards to the eco-system should be left alone and in their current status of isolation and equilibrium until a comprehensive plan of action can be formulated for their proper decommissioning and disposal according to protocol set forth by the EPA and the Regional Water Quality Control Board. Clearly construction of the Casino Project cannot go forward under the conditions. How can this land be

graded, bulldozed, trenched, and filled in without the chance of huge irreversible consequences?

9) Other hazardous elements of the Casino Project site include the improper disposal of underground chemical tanks. These tanks need to be found, inspected, and issues addressed in compliance with Regional Water Quality Control Board standards, the EPA, and the Super Fund.

10) Ground water at the Casino Project site has been affected by the improper destruction of water wells in the area. Wells that were bulldozed over by the city of Rohnert Park adjacent to the Casino Project during eminent domain processes were never properly abandoned in compliance with standards set forth by the Regional Water Quality Control Board. These sites affect the water conditions at the Casino Project site and need to be exposed, inspected, studied, and properly abounded before this Casino Project can proceed. These violations present direct danger to the water recourses of the State of California. These violations magnify the potential for the Casino Project to conduct pollutants, and otherwise degrade the waters of the State of California. These wells act currently as perforations in the earth that conduct pollutants from areas that may have been considered areas of relative hydrological isolation, to other areas of relative hydrological isolation, or to areas of high ground water transient conditions. This is in direct violation of the standards set forth by the Regional Water Quality Control Board. How can a Casino Project proceed without compounding this complex problem?

11) The displacement of low lands with fill needed to elevate the grade for the Casino Project, will lead to backing up of the natural course of surface water as it drains from my lands. As a result I will experience great increases in flooding and liquefaction. This liquefaction of my soils will cause septic system failures, septic effluent surfacing, and damage me permanently. The failing septic systems will then contaminate my wells. Since my wells then will be acting as a conductor and transmitter of human waste and septic system pollution to the aquifer, the aquifer and waters of the State of California will be degraded, as a result of the Casino Project. The displacement of low lands by the Casino Project will also cause my other neighbors to endure liquefaction and septic failures. My neighbors septic systems and human waste will be likely to enter my wells also. The net result will be the pollution of

surface and ground water. This is in violation of the Regional Water Quality Board's standards. This will lead to an unhealthy and un-safe situation for my family and my neighbors. How does the Casino Project intend to protect hundreds of low profile well casings susceptible to conduction and transmittal of known pollutants and human waste? It is not reasonable to expect all local private well owners to drill new wells and case them to high elevations, and then provide perfect hermetic sanitary seals. It is a known fact and common scenario, that typical sanitary well seals, no matter how professionally installed, will leak and cannot tolerate any submersion. In addition many properties to be effected by the Casino Project flooding, have clay soils that dry and crack badly in the summer months. These cracks provide large areas of conduction and transmission of surface water pollution to the well seal, and casing. The wells are particularly at risk from the type of pollution I have described at the beginning of every rainy season before the expansive (zone 3) clay soils compress. How can a Casino Project be built, with thousands of yards of imported fill material, and not cause the elevation and increased flooding of waters on the surface and perched water tables of my lands and my neighbor's lands?

12) American Indians, Answers to Today's Questions by Jack Utter ISBN 0-9628075-3-2. Of particular importance in this socio-economic study is the likelihood of an unsustainable nature of the Casino Project on many levels and in many ways. I believe that the Casino Project will lead to many negative socio-economic impacts on the entire population of the area as well as the independent Indian Nations.

13)

The following excerpts are from Pamela A. Millers EIR scoping comments, and are included here for your convenience, since they speak to my condition:

1) This development will have significant adverse effects on public health and safety:

- Increased air pollution from thousands of daily, additional vehicle trips on nearby roadways.
- Increased water pollution due to "non-point source" contamination from vehicle runoff, particulate matter generated by excessive vehicle exhaust settling on the ground above the aquifer, use of toxic building materials to raise and prepare building pad in a federally recognized flood plain (petroleum based asphalt products, etc.).

- Contaminated residential well water due to existing neighborhood septic systems being subjected to additional flooding as a result of water displacement from the construction of this development in a flood plain.
- Residential exposure to raw sewage ("effluent surfacing") as a result of existing neighborhood septic systems being subjected to submersion due to the displacement of flood waters.
- Increased potential for traffic accidents due to intense fog conditions noted in the area of development.
- Increased potential for traffic/pedestrian accidents due to the nature of existing nearby streets and roadways (NO neighborhood streetlights, sidewalks, bike lanes, roadside shoulders, etc.).

a) How will the air pollution be avoided?
b) How will the yearly flooding be contained and/or controlled without having negative impacts on nearby neighborhoods?
c) How will the water pollution/contaminated wells in nearby neighborhoods be avoided?
d) How will the failure of existing septic systems be avoided?
e) How will the fog be eliminated?

2) This development will have significant adverse effects on principal drinking water aquifers, prime farmlands, wetlands, flood plains, and ecologically significant areas.

- This development will be located directly over a "recharge" area necessary for the absorption of rain water to replenish the principal drinking water aquifer in this area. The creation of an impervious surface (paving over) will prohibit water absorption and cause displacement of millions of gallons of water, resulting in massive residential and environmental flooding.
- Water for drinking that is absorbed will be subjected to contamination from vehicle run off, construction materials, and both raw and treated sewage generated by the development and nearby residential septic systems.
- The property that is under consideration for this development is currently protected under The Williamson Act, is a designated community separator according to the Sonoma County General Plan, and provides the community with both open space, and grazing land for nearby dairies.
- This property is at the head of the Laguna de Santa Rosa, "the largest freshwater wetland complex in coastal Northern California" (www.lagunafoundation.org). The Laguna is comprised of wetlands, vernal pools, riparian forest, oak woodlands, grasslands, and is home to and within the establish range of five federally recognized endangered species: The California Tiger Salamander, Sebastopol Meadowfoam, Burke's Goldfields, Sonoma Sunshine, and Showy Indian Clover. The Laguna is also an important stopover for thousands of birds migrating along the Pacific Flyway,

providing a much needed source of food and rest. This property serves as an "overflow" area during the flood season.

a) How will the loss of this "water recharge" area be prevented?
b) How will the contamination of drinking water be prevented?
c) How will the loss of open space be prevented?
d) How will the loss of designated community separators be prevented?
e) How will the loss of grazing lands needed to support local agricultural enterprises, be prevented?
f) How will the loss of endangered species habitat be prevented?
g) How will the loss of wetlands be prevented?
h) How will the Pacific Flyway be re-routed?
i)Where will the floodwaters be directed to without causing major property damage and health hazards to nearby neighborhoods?

3,4,5,& 6) The significant environmental impacts of this proposed development on this particular site will have potentially catastrophic effects on wildlife, habitat, breeding grounds, water supply, and public safety for years to come.

- Property is located in a federally recognized flood plain. During the rainy season, this land is under 12 to 24 inches of floodwater (see enclosed photos). The "flood control" channel fills to capacity and overflows it's banks within a matter of hours every year.
- Sections of many roads are under water and closed to through traffic in nearby neighborhoods during the wet weather season.
- Development in this designated community separator will almost certainly set a precedent and lead to further development, thus eliminating open space and endangered species habitat. Development will lead to additional floodwater displacement, and exacerbate residential and environmental flooding.

a) Where to and how will the floodwaters be diverted?
b) Will the roads in ALL affected neighborhoods near this proposed casino site be re-built to accommodate the additional flooding?
c) How will the open space be preserved?
d) How will the designated community separator be preserved?
e) How will the Sonoma County General Plan not be violated?
f) How will endangered species habitat be preserved?
g) Will nearby homeowners be compensated by the tribe for wells gone dry, contaminated wells, and property damage due to flooding, traffic accidents, etc.?

7) N/A

8) This proposal/development will have adverse effects on endangered species and their habitats:

- California Tiger Salamander
- Sebastopol Meadowfoam
- Burke's Goldfields
- Sonoma Sunshine
- Showy Indian Clover

9) I would suggest that this proposal/development will have material adverse effects on resources requiring compliance with Executive Order 11988 (Flood plain Management). (See above).

10) This proposal/development threatens to violate Federal, State, and local laws imposed for the protection of the environment.

- Property located in a federally recognized flood plain.
- Property located in aquifer "recharge" area.
- Property located in a designated community separator.
- Property located at the head of the Laguna de Santa Rosa. Adverse environmental effects (pollution) will flow through several communities, wildlife habitats, and other environmentally sensitive locations all the way to the Pacific Ocean.
- Property is home to five federally recognized endangered species.

ALTERNATIVE SITE:

It is my feeling that this proposed development would be better suited to a property known as Skagg's Island.

Skagg's Island is located within the Graton Rancheria Tribe's aboriginal territory in Sonoma County. The island consists of approximately 3,300 acres, with 60 acres already developed as a Naval base. The base has long been abandoned, and the U. S. Navy has expressed a desire to turn this property over to the U. S. Fish and Wildlife Service. This property is located off of Highway 37, a direct route to major metropolitan areas close by which would provide easy accessibility for the tribe's casino patrons. With the existence of the Naval base, the necessary infrastructure to support the tribe's development is already in place. There would be no need for major road improvements, no loss of residential dwellings, no construction in a flood plain, no loss of wildlife habitat, no compromising of public safety, water/air quality, no loss of open space, etc. This property at Skagg's Island is large enough to provide the tribe with several hundred acres of land for their use, as well as saving the remainder of land for environmental preservation, if desired. Skagg's Island is indeed an economically viable location for this development. Prior to taking an action with respect to the Casino Project, your agency should review, at a minimum, and in no particular order, the following documents relating to the prevailing local and Countywide water supply scenario to determine whether the Casino Project has the potential to cause negative impacts to the human environment: - (end of Pam's comments)

I have included the following excerpts from the Owl Foundation's comments for your convenience since they also speak to my condition:

Prior to taking an action with respect to the Casino Project. Your agency should review, at a minimum, and in no particular order, the following documents relating to the prevailing local and countywide water supply scenario to determine whether the Casino Project has the potential to cause negative impacts to the human environment:

- Entire administrative record for the Sonoma County Water Agency Water Supply and Transmission System Project (an exemplar table of contents for the administrative record is included herewith as Attachment A), including, but not limited to:
  - The proposed New Master Water Supply Agreement.
  - Eleventh Amended Agreement for Water Supply.
  - Tenth Amended Agreement for Water Supply and Construction of the Russian River-Cotati Intertie.
  - All prior amendments to the Water Supply Agreement.
  - Supplemental Water Supply Agreement.
  - 2001 Memorandum of Understanding Regarding Water Transmission System Capacity Allocation During Temporary Impairment.
- All other files held by the Sonoma County Water Agency concerning water quality and water supply issues, including, but not limited to, files concerning:
  - All past and present Water Contractor Agreements and other water supply contracts, agreements, and documentation, including those relating to Warm Springs Dam;
  - Available and forecasted surface and ground water supplies.
  - Land surface deformation (i.e., subsidence and uplift).
  - Designated areas of natural recharge.
  - Groundwater level data.
  - Water quality data regarding the Laguna de Santa Rosa wells.
  - Water pollution, contamination, and toxicity.
  - Historic and current water quality monitoring data.

- o Flood data, floodplain maps, and flood control projects.

- 2000 Sonoma County Urban Water Management Plan.

- "Evaluation of Groundwater Supply Alternatives Water Supply and Transmission Project" prepared for the Sonoma County Water Agency by Parsons Engineering Science, Inc. (1995).

- All files held by the Sonoma County Health Department concerning studies, reports, and complaints regarding areas of contaminated water, and water contamination, degradation, pollution, or toxicity in Sonoma County water supplies, including Well Drillers Reports on water quality.

- All files held by the California Department of Health Services concerning studies, reports, and complaints regarding water quality of Sonoma County water supplies.

- All files held by the Sonoma County Permit and Resource Management Department concerning available water supplies and water quality concerns, including, but not limited studies, reports, evaluations, determinations, and Well Drillers Reports.

- All files held by the California State Department of Water Resources concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.

- All files held by the United States Geological Survey concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.

- United States Geological Survey "Map Showing Ranges in Probable Maximum Well Yield from Water-Bearing Rocks in the San Francisco Bay Region, California" (1972) (D.A. Webster, Miscellaneous Field Studies May, MF-431).

- United States Geological Survey "Groundwater Atlas of the United States, California and Nevada" (2003) (http://ca.water.usgs.gov/groundwater/gwatlas/reference/index.html).

- All contracts by the United States Geological Survey, County of Sonoma, and Sonoma County Water Agency for all studies and evaluations of surface and groundwater supplies in Sonoma County.

- The Sonoma County General Plan.

- Entire administrative record concerning the Sonoma County General Plan Update for Year 2020, including all documents and public testimony regarding the Water Resources Element.

- All files held by the City of Rohnert Park concerning the City's General Plan, Specific Plans, and all related amendments in relation to City water supplies and water quality, the 2000 Final Environmental Impact Report prepared for the City's 2000 General Plan (including studies, evaluations, and consulting work prepared in connection with the 2000 FEIR in relation to City water supplies, such as the study performed by PES Environmental, Inc.), City groundwater well logs, land surface deformation (i.e., subsidence and uplift), water level data, water quality data, the City's letter request to the Sonoma County Water Agency to implement a Groundwater Management Plan (dated October 22, 2002), and the Sonoma County Water Agency's letter denial to implement a Groundwater Management Plan (dated November 26, 2002).

- The 1984 Penngrove Specific Plan.

- Entire administrative record and resulting Settlement Agreement relating to the 2002 Sonoma County Superior Court case entitled South County Resource Preservation Committee and John E. King v. City of Rohnert Park, Case No. 224976.

- Entire administrative record concerning the City of Santa Rosa Board of Public Utilities Incremental Recycled Water Program, including, but not limited to, all resolutions, environmental documentation, studies, reports, public comment, and presentations.

- Year 2001 Senate Bills 221 and 610 (codified at relevant provisions of the California Government, Public Resources, and Water Codes).

- The 2003 Kleinfelder Report prepared for the Sonoma County Water Agency addressing water scarce areas of Sonoma County including Bennett Valley, Mark West Springs, and Joy Road Area.

- The published Court of Appeal decision in Friends of the Eel River, et al. v. Sonoma County Water Agency, et al. (2003) 108 Cal.App.4th 859.

- August 11, 2003 letter from the General Manager of the Sonoma County Water Agency to Water Contractors in response to the Friends of the Eel River decision.

- DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center, John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker.

- February 24, 2004 letters from John King, the Brandt Hawley Law Group, and the lawfirm of Weston, Benshoof, Rochefort, Rubalcava & MacCuish to the City of Rohnert Park in opposition to the City's proposed Resolution No. 2004-34.

- March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.

- "Santa Rosa Plain Ground Water Model" - California Department of Water Resources (1987).

- "Meeting Water Demands in Rohnert Park" - California Department of Water Resources, Central District (1979).

- "Geology & Groundwater in the Santa Rosa and Petaluma Valley Areas" - California Department of Water Resources and United States Department of Interior (1958)(G.T. Cardwell).

- "Statement on Groundwater Conditions in Santa Rosa, Petaluma, and Sonoma Valleys, Sonoma County, CA" - United States Department of the Interior - Geological Survey - Groundwater Branch (1955)(AR Leonard and G.T. Cardwell).

- "Groundwater Basins of California, a Report to the Legislature in Response to Water Code Section 12924" (1980).

- "Bulletin No.118 - 4, Volume 1: Geologic & Hydrologic Data 1975; Volume 2: Evaluation of Groundwater Resources Sonoma County, Santa Rosa Plain 1982; Volume 3: Petaluma Valley 1982" - California Department of Water Resources.

- "Groundwater Management in California" - California Department of Water Resources (1999).

- "Bulletin 118 Update" - California Department of Water Resources (2003).

In addition to the wealth of other information that is available for review and consideration by your agency, the information contained in the foregoing documents demonstrates that a sufficient water supply is not available to serve the proposed Casino Project and that the project would cause significant impacts to scarce natural resources in the proposed development area.

Please note that, in addition to a copy of this letter, the O.W.L. Foundation will submit hard copies of the following three items at the March 10, 2004 public scoping meeting to be held in Sonoma County:

(1) 2000 Environmental Impact Report for the City of Rohnert Park General Plan and Urban Growth Boundary ballot measure;

(2) DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center. John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker; and

(3) March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.

In conclusion I would like to say that until neighbors like myself are properly included in the process and properly informed of the facts, this Casino Project cannot have a positive socio-economic impact. The sociological impact on the American Indians will be even worse. Gillian Flaccus of the Associated Press stated on 3-28-2004 ".....Nearly one-fifth of the 61 tribes that have gambling compacts with California are fractured by membership disputes. Many of those who have been kicked out of tribes in California say the motive is greed – an attempt by tribal leaders to reduce membership so they can keep more casino profits for them-selves and other favored members. "The perception is the tribes are not acting like Indians. They are acting like sheikdoms and cutting out anyone

they don't like" said Patrick Romero Guillory, a tribal attorney representing members who were removed from the rolls of the Sanra Rosa Rancheria in Freson and jimself and Opelousa Indian from Louisiana.""

I would also like to quote Greg Sarris "We don't want to get into slot machines and hard-core gambling because it is addictive and destructive in peoples lives."

Thank you for all your careful study, time, energy, and consideration of all the documents mentioned in this document. I place these comments in your hands to be entered into public record.

Sincerely,

Lloyd Iversen

Cc: Donald Black - Attorney

together with its late-hours of operation, it is expected that the residents of the Mobile Home Park could be materially affected by noise and light emanating from the Project. The Mobile Home Park is desirous that steps be taken to mitigate these impacts on the Mobile Home Park residents as much as possible. To address these concerns, as part of the design and construction of the Project, a wall together with landscape barriers (comprised of trees and bushes of sufficient quality and quantity) needs to be constructed along that part of the Project which borders the Mobile Home Park. Such a wall, if of sufficient height, together with appropriate landscape barriers would serve as both sound and light barriers absorbing to some degree the sound and light emanating from the Project. The construction of such a wall would also address some of the security concerns associated with operation of the Project immediately adjacent to the Mobile Home Park.

In addition, the Project should incorporate setbacks of sufficient distance along that side of the Project which borders the Mobile Home Park. This would serve to further mitigate the impact of sound and light emanating from the Project.

Request is hereby made that the foregoing matters be included as part of the EIS pertaining to the Project. If you have any questions concerning these matters, please do not hesitate to contact the undersigned.

Very truly yours,

GILCHRIST & RUTTER
Professional Corporation

Duane M. Montgomery
For the Firm

DMM:ab/101484_1.DOC/032204
3402.005

cc: Mr. William C. Allan, U.S. Department of the Interior
Carl Eric Leivo, City Manager, City of Rohnert Park
Ms. Anne James, James & Associates, Inc.
David Spangenberg, Esq., Law Offices of David Spangenberg
Mr. Raymond K. Will, Todd Engineers
Richard H. Close, Esq., Gilchrist & Rutter

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CITY OF
SANTA ROSA

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March 31, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L. Street, N.W., 9th Floor
Washington, DC 20005

Re: Federation Indian of Graton Rancheria Casino and Hotel Project, Sonoma County California

Dear Ms. Nagle:

These scoping comments are submitted by the City of Santa Rosa ("City") to assist in the preparation an Environmental Impact Statement ("EIS") for the Graton Rancheria Casino and Resort Proposal (the "Project") and to supplement the oral comments provided by the City at the March 11, 2004, agency scoping meeting convened by the National Indian Gaming Commission ("NIGC") as the federal lead agency for the Project. The proposed Project is located immediately south of Santa Rosa, within one and one-half miles of the southwest quadrant of the City. The area surrounding the proposed Project site, including Southwest Santa Rosa and the adjacent unincorporated county area, is semi-rural and has substantial unmet infrastructure needs. Accordingly, it is critical that the Draft EIS carefully evaluate the impacts to the entire area affected by the Project. Although the proposed site is adjacent to the City of Rohnert Park on one side, the County and Santa Rosa also will be substantially affected by the Project.

GENERAL COMMENTS

1. Project Description and Approvals

The City believes that the NIGC, as federal lead agency, should have provided a more detailed project description in order to facilitate this scoping process. It is very difficult to prepare even scoping-level comments without a better description of what is proposed, in particular, the location of the proposed facility on the site, the acreage proposed to be developed and the size of the proposed

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facility (*e.g.* the estimated square footage of the facilities and parking areas, number of hotel rooms and anticipated uses included in the Project.) While a complete project description is not required for scoping, greater detail should have been provided. The City urges the NIGC to provide a more thorough description in advance of the preparation of a final scoping document to allow interested agencies to better evaluate the potential for and nature of impacts within their jurisdictions.

The project description ultimately included in the Draft EIS should include all necessary elements of the Project, including any related or connected actions. In particular, given that the Project is proposed in a largely undeveloped area, any necessary improvements to or extensions of the infrastructure in the surrounding area should be identified and the impacts associated with the required improvements evaluated. Cost estimates for necessary infrastructure improvements also should be provided in order to evaluate the adequacy and feasibility of any proposed mitigation.

The Draft EIS should provide a clear and complete explanation of the federal approvals required for the Project, if any, and address whether the proponent will be required to implement any feasible mitigation or consider alternatives to the Project. The Draft EIS should specifically address whether discretionary approvals are required from the NIGC, the U.S. EPA, the U.S. FWS and the U.S. Army Corps of Engineers and describe the criteria for issuing those approvals, including the ability of the federal agencies to impose any feasible mitigation.

2. **Future Development of the Project Site**

The Project is proposed to be located on a large undeveloped site, giving rise to the possibility of additional future development. The Draft EIS should consider all reasonably foreseeable future development plans, including any proposed retail uses or other commercial development.

3. **Purpose and Need for the Project / Alternatives to the Proposed Project**

The Draft EIS should contain a complete statement of purpose and need for the Project. This is necessary to evaluate the rationale for and appropriateness of the proposed Project site and to evaluate potential alternatives to the Project and site as proposed.

4. **Mitigation**

The Project proponent has made publicly available a great deal of information relating to how it proposes to mitigate potential impacts of the Project. The proposed mitigation apparently is largely in the form of payments to the adjacent municipality, the City of Rohnert Park. However, as stated above, the Project will affect all surrounding areas equally, including the unincorporated areas of the County and Santa Rosa. The level of payments contained in the Memorandum of Understanding between the proponent and Rohnert Park suggests that the potential impacts resulting from the Project are substantial. Yet the impacts on Rohnert Park that the proponent proposes to mitigate reflect only a portion of those impacts. Moreover, cash payments may serve to mitigate certain

socio-economic impacts but will not fully mitigate environmental impacts. The Draft EIS needs to evaluate and recommend concrete mitigation measures to reduce or eliminate impacts throughout the surrounding area, irrespective of any proposed cash payments.

Finally, the mitigation proposed in the Memorandum of Understanding is largely off-site mitigation. The proposed site is very environmentally sensitive. The Draft EIS should focus on the potential for on-site mitigation, including avoidance and reduction of impacts. The need for on-site mitigation is most important in the case of the potential biological impacts. Given the sketchy project description provided to date, the size and proposed location of Project on the site is not clear. The Draft EIS should examine whether the facilities can be designed in a way to avoid particularly sensitive areas. For example, the EIS should evaluate whether impacts could be avoided by limiting size of facilities or limiting sprawling parking lots.

SPECIFIC COMMENTS

1. Traffic

Without a clear project description it is difficult to evaluate the potential for significant traffic impacts. However, we understand that the number of vehicle trips associated with the Project may be between 10,000 and 20,000 trips per day. Any significant increase in traffic will significantly affect traffic conditions in Santa Rosa.

It is anticipated that the Project will result in a substantial increase in traffic on surface streets in the surrounding area. A key issue is the capacity and condition of those surface streets and whether those streets can handle the anticipated increase in traffic. The Draft EIS should evaluate the current and projected level of service on existing roadways, as well as any necessary roadway improvements to determine if impacts can be mitigated.

Specifically, the Draft EIS should evaluate impacts and potential mitigation for the following roadways segments:

- Stony Point Road from Hearn Avenue south
- Wilford interchange with Highway 101
- Rohnert Park Expressway interchange
- Rohnert Park Expressway west to Stony Point Road
- Highway 116 from Sebastopol to Stony Point Road

In addition, Highway 101 in the vicinity of the Project already operates at a low level of service. This is particularly true through downtown Santa Rosa during most of the day and evening. Traffic on Highway 101 will be severely impacted by any substantial increase in traffic resulting from the Project. The Draft EIS should evaluate these impacts along with any necessary mitigation to improve capacity and traffic flow.

2. Transit

The impact of the Project on transit services is a critical issue given the potential for significant traffic impacts resulting from the Project. The Draft EIS should evaluate the current level of transit service to the area and any necessary upgrades in terms of service and infrastructure. In particular, the EIS should evaluate any potential increase in demand on existing transit providers, including Golden Gate Transit, Sonoma County Transit and the Santa Rosa CityBus, which provides connector service to area. The EIS should address whether there will be a specific need for Santa Rosa CityBus to serve the Project area.

The analysis should include an evaluation of the potential for increased use of mass transit to reduce traffic congestion resulting from the Project. The Draft EIS should consider whether the Project facilities are designed to encourage use of transit. For example, the document should address the proximity of transit stops to the facilities and the location of routes along main transportation corridors to increase the likelihood of transit use.

The Draft EIS should evaluate the adequacy of the existing transit infrastructure and identify and evaluate the impacts associated with necessary upgrades to serve the Project. Specifically, the Draft EIS should address necessary public transit accommodations on existing roads, such as the addition of bus "bulb outs" to remove buses from the flow of traffic, and the need for road widening to accommodate expanded transit service.

Finally, the Draft EIS should evaluate the possibility of a dedicated shuttle service for employees and patrons to reduce impacts on traffic and the existing transit system.

3. Public Services

The proposed Project will have significant impact on the demand for public services, including police, fire and emergency services. A summary of a literature search of current research into casino-related crime and the impact on the demand for public services conducted by the Santa Rosa Police Department is attached for your review. The Draft EIS should include a thorough analysis of the potential for an increase in crime and the demand for police services in all surrounding areas. The analysis of the increase in demand for services should not be limited to Rohnert Park, even if it has agreed to provide such services. The Project is located in an unincorporated area of the County and is adjacent to several other jurisdictions. The potential for impacts in all surrounding jurisdictions needs to be addressed.

In addition to the types of crime more directly related to gambling activities, such as on-site crimes and robbery in the immediate vicinity of the casino, the Draft EIS should evaluate the increase in demand for police, emergency and social services related to an increase in traffic-related incidents and the potential increase in family crime, including domestic violence, child neglect and child abuse.

The Project proponents have proposed entering into a contract for fire protection and emergency services with a local fire district. However, the Draft EIS should evaluate both the increase in demand for on-site services and the increase in demand in surrounding areas. Moreover, most of the local jurisdictions have in place back-up agreements that will result in impacts to other jurisdictions if demand increases in any one area.

4. **Water Supply**

The Project apparently intends to rely on groundwater for its water supply. Sonoma County is experiencing increasing demand on all water supplies, both groundwater and surface water. Groundwater is an important component of the overall water supply for the entire region. The Draft EIS should evaluate the increase in demand for groundwater resulting from the Project in the context of any regional planning efforts in progress.

The Draft EIS should evaluate any secondary impacts of the Project, including the need for expanded water supply infrastructure triggered by a major increase in the demand for groundwater and the potential for the Project to limit housing construction in the region due to the limited availability of water.

5. **Wastewater**

Santa Rosa operates the Subregional Wastewater Treatment Facility that currently serves several jurisdictions in the region. Disposal capacity for treated wastewater has been a significant long-term concern because of limitations on the volume and nature of the wastewater that the receiving waters can handle. Apparently, the Project proponent proposes to treat wastewater generated by the Project on-site. The Draft EIS should address the level of treatment proposed, the availability of disposal options for treated wastewater, the impact on Section 303d impaired receiving waters and the impact of the addition of the Project's load on the Subregional System's discharge and NPDES permit.

The Draft EIS also should identify any potential demand for overflow capacity to be served by the Subregional System. It should address the proposed plan for pretreatment of Project wastewater and the ability of the Subregional System operator to enforce its pretreatment standards and compel compliance with the standards, including the right to enforce standards through legal action. In order to accept wastewater from the Project the Master Plan for the Subregional Wastewater Treatment Facility would need to be modified and would be subject to environmental review under state law. Given that it is not a Subregional Partner, the proponent would be required to fund any necessary changes.

6. **Biological Resources**

The proposed site apparently possesses substantial resource values, including sensitive habitat for

endangered and protected species. Development in the Southwest Santa Rosa area and County may be significantly limited by the need to preserve sensitive habitat. All public and private landowners in the area that control land with protected habitat are likely to be required to contribute to an area-wide conservation plan. All jurisdictions, including Graton Rancheria, need to address this issue and develop plans that avoid and reduce impacts to sensitive habitat on-site. The design and location of Project facilities should avoid impacts to sensitive habitat to the extent possible and resources should be preserved on-site. Regardless of the approval requirements for this Project, the Draft EIS should evaluate the Project in the context of the standards applicable to other public and private development in the area.

If sensitive habitat is not preserved on this site, it may unfairly limit development in the entire area by forcing additional conservation on other sites. The surrounding area is one of the few affordable areas in the region with land available for the development of workforce and affordable housing.

Finally the Draft EIS should address the environmental, social and economic impacts associated with the use of a site with significant resource values that has been previously zoned for open space and as a community buffer for a large-scale commercial development.

7. **Open Space and Agricultural Land Issues**

The Draft EIS should address the impact of the Project on existing open space requirements and goals and any impact on protections for agricultural land currently available for the proposed site under the Williamson Act.

8. **Socio-economic Impacts**

The Draft EIS should evaluate the impact of the Project on local businesses and the economy. It may be very difficult for local business to compete with the Project, particularly considering the competitive tax advantage enjoyed by the Project. This is of particular concern if the Project will ultimately include retail establishments that will compete with local businesses that are subject to sales tax. Secondary impacts associated with blight resulting from failed business should also be addressed. Finally, the Draft EIS should address the impact on tax revenues in surrounding jurisdictions resulting from loss of businesses and housing.

We appreciate the opportunity to provide these scoping comments and your considerations of these issues in the Draft EIS.

Very truly yours,

Elisabeth Gunther
Assistant City Attorney
City of Santa Rosa

ERG:tsg
Attachment

University of Maryland; Department of Economics Study – The Social and Economic Impact of Native American Casinos (August 7, 2002)

- Casinos may divert customers from the existing businesses to the detriment of the local economy
- Common concerns of higher crime and bankruptcy rates
- Decrease in unemployment rate
- Auto thefts, larceny, violent crime, and bankruptcies are all up by about 10% four or more years after a casino opens in a county. Bankruptcies also increase in counties within 50 miles of a casino.
- By law, states cannot tax the profits of tribal businesses, but in some states, tribes have agreed to make annual payments to state governments.
- Native America adults 25+ on trust land as compared with the rest of the US:
    - Twice the high school drop out rate
    - 1/5th the college graduation rate
- 1/5th of households on reservations do not have complete indoor plumbing or access to a vehicle; 1/6th do not have complete kitchens; ½ do not have a telephone in the home.

Maryland Attorney General J. Joseph Curran, Jr.'s report on the impact of casino gaming on crime – The House Never Loses and Maryland Cannot Win: Why Casino Gaming Is A Bad Idea (1995)

Mississippi

- Riverboat Casino Gaming was introduced on the Mississippi Gulf Coast Mid 1992;
    - Law enforcement and social services workers state that casinos on the Gulf Coast have "fueled a crime wave and aggravated social problems." Even with "beefed-up" police forces, law enforcement is "barely keeping up with the jump in crime."
    - Crime increased in every category in 1994, with murder, rape, robbery and car theft at least doubling.
    - Then categories of violent crime increased by 64% in Gulfport and 46% in Biloxi in 1994. In actual numbers, Biloxi went from 5,072 violent crimes in 1993 to 7,413 in 1994. Gulfport went from 5,416 to 8.887.
    - Bank robberies plagued 16 banks along "casino row" in 1993, breaking an all-time record and representing a 300% increase over the previous year.

CHANGE IN GULFPORT, MISSISSIPPI CRIME RATES BETWEEN JAN-AUG, 1993 AND JAN-AUG, 1994

CRIME	1993	1994	PERCENT CHANGE
Murder	4	7	+75%
Rape	14	42	+200%
Robbery	43	177	+311%
Assaults	793	1302	+64%
Larceny	1259	2414	+91%
Burglary	310	623	+100%
Vehicle Theft	97	253	+160%
Arson	12	31	+158%
TOTAL	2532	4849	+92%

Colorado

Gilpin County – Black Hawk Casino

- Alcohol-related traffic accidents to and from Black Hawk and Central City increased 79% in the first year after gaming began. Traffic accidents generally are up 250% since gaming began.
- DUI's shot up from 5 to 305 in two years.
- Check fraud is "incredible." The Police Department has a huge backlog, and credit card fraud is also a growing problem.
- Gilpin County, where Black Hawk is located, has also felt the impact. It experienced huge increases in arrests, felonies and incarcerations between 1991 and 1993. Deputy Sheriff Stephanie Behymer reported that arrests went up from 18 to 92 per month, or 411%. Incarcerations rose from 2 to 35 per month, or 1,650%.

GILPIN COUNTY AND BLACK HAWK CASES FILED AND OFFENSES REPORTED BETWEEN 1991 AND 1993

TYPE OF CASE	1991		1992		1993		PERCENT CHANGE	
	Gilpin	Black Hawk	Gilpin	Black Hawk	Gilpin	Black Hawk	Gilpin	Black Hawk
Misdemeanors	122	8	387	84	372	119	+205%	+1388%
Felony	20	2	70	22	89	35	+345%	+1650%
Traffic	305	25	1244	400	1649	702	+440%	+2708%
TOTAL CASES	447	35	1701	506	2110	856	+372%	+2345%
Number of Offenses Reported		126		1554		2112		+1576%

- The Mayor of Black Hawk admits, "We thought we'd studied the problem thoroughly; I don't think we studied it enough."

Cripple Creek

- Calls for service rose from 40 per month to 45 per day after October 1991. DUIs increased from 4 per year to 1 per week.
- Total index crimes increased287% between 1991 and 1994. Aggravated assault rose 75% and larceny rose 329% (Colorado Dept. Public Safety, Bureau of Investigations - UCR)

Central City

- Population 350 – In first year after Casino opened:
  - +228% - Larceny
  - +400% - Burglary
  - +100% - Auto Theft
  - +162% - Total Crime Index

- From 91 arrests to 331 - +275%

- The police department received more calls for service in the first three months of 1992 than in all of 1990, and calls increased 423% from 1991 to 1992, as reported by Chief of Police Gatlin in 1992. Also of note – skyrocketing incidents of disorderly conduct, fights and DUI as well as the presence of Asian gang members at the casino.

South Dakota

Deadwood – Lawrence County

- Case filings for class one misdemeanors and felonies jumped 69% in the first 10 months after casinos opened.
- Calls for service rose 300% in the first year and continued to rise
- Serious crimes increased 93% in first 5 year period (including theft, assaults, DUIs) and less serious offenses increased 40%

DEADWOOD POLICE DEPARTMENT ACTIVITY 1988-1994

ACTIVITY	1988	1989	1990	1991	1994	PERCENT CHANGE 1989-94
Calls for Service	1259	1380	2555	3295	5072	+268%
Arrests	Not avail.	229	469	449	829	+262%
Traffic Citations	Not avail.	411	926	430	861	+109%
TOTAL	1259	2020	3950	4174	6762	+235%

SOURCE:
DEADWOOD POLICE DEPARTMENT

LAWRENCE COUNTY CASE FILINGS
Population 21,000
Casinos Opened November, 1989

TYPE OF CASE	1986	1989	PERCENT CHANGE FROM 1986-1989	1990	1993	PERCENT CHANGE FROM 1989
Class 2	3997	3578	-12%	4325	5262	+47%
Class 1	629	507	-24%	569	1008	+99%
Felony	127	132	4%	197	225	+71%
TOTAL	4753	4387	-8%	5091	6142	+40%

SOURCE:
SOUTH DAKOTA SUPREME COURT'S ANNUAL REPORTS, "BENCHMARK"

New Jersey

Atlantic City

- In the first ten years the city had casinos, the total crime index rose a staggering 258%. Non-violent index crimes increased 272%. Between 1978 and 1993, violent crime rose by 199%, and larceny skyrocketed 481%. During this same period, Atlantic City's population declined by about 12%.

PERCENT CHANGE IN CRIME RATES OF MAJOR U.S. CITIES BETWEEN 1977 AND 1990

	CHICAGO	ORLANDO	BALTIMORE CITY	ATLANTIC CITY	US
Aggravated Assault	-27%	+218%	+24%	+327%	+97%
Rape	+174%	+113%	+38%	+159%	+62%
Larceny	+22%	+96%	+19%	+504%	+35%
Crime Rate Per 100,000 Population	+103%	+53%	+31%	+235%	+15%

SOURCE:
FEDERAL BUREAU OF INVESTIGATION UNIFORM CRIME REPORTS

Crime Highlights:

- Narcotics related crimes (Heroin and others) became a major problem in Atlantic City.
- Gang activity and criminal racketeering enterprises increased the number of shootings in the city.
- Credit card fraud, bad checks and other financial crimes became a huge problem.
- Domestic violence and child abuse incidents rose.
- Money laundering (Drug money)
- Pawn shops increased from 2 to 100
- NJ State Police Division of Gaming Enforcement are responsible for crimes within casinos

Connecticut

Ledyard – Foxwoods Casino – a 315,000 square foot facility in a town with a population of approximately 15,000 in 1992.

TOWN OF LEDYARD, CONNECTICUT
Population 14,890
Foxwoods Casino - opened February, 1992

CRIME RATES 1991-1994

INDEX CRIMES	1991	1992	1993	1994	PERCENT CHANGE
Rape	1	2	5	7	+600%
Robbery	0	1	8	9	+900%
Aggravated Assault	21	26	36	37	+76%
Motor Vehicle Theft	5	15	15	27	+440%
Larceny	137	216	319	708	+417%
TOTAL INDEX CRIMES	220	299	428	838	+281%

SOURCE:
CONNECTICUT DEPARTMENT OF PUBLIC SAFETY
DIVISION OF STATE POLICE
CRIMES ANALYSIS UNIT

♦ The Connecticut State Police provide primary police services to Foxwoods. Records of State police activity in Ledyard and in the casino again show substantial increases in criminal activity since the opening of Foxwoods. Because the Mashantucket-Pequots tribe maintains its own, independent police department, these figures do not reflect any of its enforcement activity in or around the casino.[11]

CONNECTICUT STATE POLICE ACTIVITY
IN LEDYARD AND FOXWOODS

STATE POLICE ACTIVITY	1991	1992	1993	1994	PERCENT CHANGE
Arrests	229	399	558	669	+192%
Accident Investigations	293	338	430	484	+65%
Motor Vehicle Enforcement	773	1005	839	1116	+44%
Misc. Service Reports	2118	4026	4197	4807	+127%
TOTAL	3413	5768	6024	7076	+234%

SOURCE:
CONNECTICUT DEPARTMENT OF PUBLIC SAFETY
DIVISION OF STATE POLICE
BUREAU OF CRIMINAL INVESTIGATIONS

San Jose California Card Rooms

Bay 101 & Garden City

COMPARISON OF BOTH CARDROOMS

Calls for Service

Bay 101 has experienced a 24% increase in calls for service when compared to last year and a 56% increase from FY 99-00. Garden City experienced a 1% increase in calls for service from the previous year and a 51% increase from FY 99-00.

An overall look into which type of calls have increased from last year reveals that for both card rooms combined, Child Neglect calls increased by from 3 to 9 and Forgery calls rose by from 2 to 14. Bay 101 had an increase in Forgery calls from 1 to 13.

Bay 101 Card room

1062	MEET THE CITIZEN	4
1066	SUSPICIOUS PERSON	3
10851	STOLEN VEHICLE	3
10852	VEHICLE TAMPERING	2
1087	MEET THE OFFICER	1
11550	UNDER THE INFLUENCE	1
1181	VEH ACCIDENT w/MINOR INJURY	3
1182	VEH ACCIDENT PROPERTY NON-INJURY	1
20002	MISD HIT AND RUN	6
211	ROBBERY	1
242	BATTERY	17
270	CHILD NEGLECT	5
273.5	DOMESTIC VIOLENCE	3
415	DISTURBANCE	17
415A	DISTURBANCE FIGHT	7
417	BRANDISHING	1
422	TERRORIST THREATS	1
459 VEH	VEHICLE BURGLARY	1
470	FORGERY	13
484	PETTY THEFT	6
487	GRAND THEFT	1
518	EXTORTION	1
537	DEFRAUDING AN INNKEEPER	1
594	VANDALISM	1
602PC	TRESPASSING	10
647F	DRUNK IN PUBLIC	4
653M	OBSCENE / HARASSING PHONE CALLS	1
5150	MENTALLY DISTURBED	3
ATL	ATTEMPT TO LOCATE	1
FDAID	FIRE DEPT REQUEST FOR PD	1
MUNI CODE	MUNICIPAL CODE VIOLATION	1
SUSCIR	SUSPICIOUS CIRCUMSTANCES	1
6F / 6M	WARRANT ARRESTS	2
WELCK	WELFARE CHECK	1
	TOTAL	**125**

Garden City Card Room

1053	PERSON DOWN	2
1066	SUSPICIOUS PERSON	5
1066P	SUSPICIOUS PACKAGE	1
10851	STOLEN VEHICLE	2
11300	NARCOTICS	1
1181	MINOR INJURY ACCIDENT	1
1182	VEHICLE ACCIDENT NON-INJURY	3
148	FALSE REPORT OF A CRIME	1
20002	MISD HIT & RUN	4
242	BATTERY	7
270	CHILD NEGLECT	4
415	DISTURBANCE	21
415A	DISTURBANCE FIGHT	1
415UNK	DISTURBANCE, UNKNOWN TYPE	1
422	TERRORIST THREATS	2
459 VEH	VEHICLE BURGLARY	1
470	FORGERY	3
484	PETTY THEFT	2
503	EMBEZZLEMENT	1
487	GRAND THEFT	3
537	DEFRAUDING AN INNKEEPER	1
647F	DRUNK IN PUBLIC	3
6F	FELONY WARRANT	2
ATL	ATTEMPT TO LOCATE	1
CSB	CITIZEN STAND-BY	2
FDAID	FIRE ASSISTANCE	1
FNDPRP	FOUND PROPERTY	1
SUSCIR	SUSPICIOUS CIRCUMSTANCES	2
WELCK	WELFARE CHECK	3
	TOTAL	**82**

Excerpt from "Cutting the Cards and the Craps: Right Thinking About Gambling Economics" – by Earl L. Grinols, University of Illinois, former Senior Economist, Council of Economic Advisors – December 21, 2001

Direct Crime Cost Estimates (Page 12)

Direct estimates of the crime costs due to casinos, for example, has led to numbers that are similar to the crime cost estimates derived from the criminal activity of problem and pathological gamblers but they tend to be a little higher. Many experts believe that the primary cause of increased crime observed in counties with casinos is due to problem and pathological gamblers. However, crimes could result in other ways, and tallying only crime due to P&P gamblers would understate the true amount of crime due to casinos. To directly estimate the amount of crime due to casinos, Grinols and Mustard (2001a) compiled data for every county in the Unites States for the twenty-year period from 1977-96. Based on statistical analysis they reported that 8 percent of observed crime in casino counties was due to the presence of the casino. They found that it generally takes 3 or 4 years after casino introduction before crime rates begin to rise. The cost of this crime was $63 per adult per year in casino counties. This is comparable to the results of a study by Thompson, Gazel, Rickman (1996) conducted in the state of Wisconsin. They reported that crime costs per additional problem gambler were $4,225, or 42 percent of the total costs found. On a per capita basis crime cost $57 per adult. Both figures are higher than the $46 estimate used in Table 1 below, derived from the crimes of problem and pathological gamblers alone.

Table 1: **Summary of Per Capita Casino Costs and Benefits**

BENEFITS		
Net Increase in Business Profits	$0	
Net Increase in Tax Collections	$0	
Distance Consumer Surplus for Non-Problem, Non-Pathological Gamblers	$34	
		$34
COSTS		
Crime	$46	
Bus. & Employment	$51	
Bankruptcy	$4	
Suicide	$??	
Illness	$8	
Social Svcs.	$27	
Direct Regulatory	$10	
Family Costs	$1	
Abused Dollars	$44	
		$190
NET SOCIAL COST		**-$156**

City of Cotati

Sonoma County, California

March 31, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW., 9th Floor,
Washington, DC 20005

Re: "DEIS Scoping Comments, Graton Rancheria Casino Project"

Dear Ms. Nagle:

These scoping comments concerning the proposed Graton Rancheria Casino project are being submitted on behalf of the City of Cotati, Sonoma County, California. The City of Cotati, a small, incorporated community of less than 7,000 residents is located adjacent to the City of Rohnert Park and within two miles of the proposed Casino project site. The likely primary travel route to the proposed Casino from the main highway in the vicinity, U.S. 101, runs directly through the City of Cotati. Casino customers will exit 101 at Highway 116, and then travel west to Stony Point Road, where they will then turn north on Stony Point Road to the proposed casino site. There is no question that the City of Cotati will be directly and significantly impacted by the proposed Casino project. Given the small size of the City of Cotati and its limited resources; its location on the primary travel route to the proposed Casino; and the City's overall close proximity to the proposed site, the City of Cotati has significant concerns regarding the proposal. The City believes that it likely would be the most impacted community in Sonoma County, if this proposed project is developed. Consequently, the City formally requests that it be informed of proposed actions regarding this proposal as well as future related actions and that the City be given a meaningful opportunity for comment on those actions with appropriate response and follow-up from the development interests involved to protect the interests of Cotati citizens. Listed below are more specific scoping comments from the City of Cotati regarding the referenced proposed Casino project.

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201 West Sierra Avenue, Cotati, CA 94931-4217 • TELEPHONE 707•792•4600 • FAX 707•795•7067

"DEIS Scoping Comments, Graton Rancheria Casino Project"

The DEIS for the proposal must address and satisfactorily mitigate possible impacts in the following areas, with assurance that the identified mitigation measures could and would be implemented. This analysis must consider alternative sites and project design options, as necessary, to satisfactorily mitigate the possible impacts identified. The following are issues of particular concern:

1. Fundamental adopted General Plan policies of the County of Sonoma require "Community Separators" to ensure a wide-range of long-standing County objectives, including the protection of valuable open space and agricultural resources; retaining a rural character in the County; enabling a development pattern that features separate and identifiable cities and communities, promoting a more compact growth, with greater efficiency and economy in providing public services. Agricultural and open space lands in the Community Separators also provide the opportunity for groundwater recharge as well as the protection of rare and endangered species, riparian environments, and biotic and wildlife resources. The proposed project site is within a "Community Separator" as depicted in Figure OS-2. Schematic Map of Designated Scenic Resource Areas. of the Open Space Element of the County of Sonoma General Plan. The proposed Casino project is substantially inconsistent with the County of Sonoma General Plan, including, but not limited, to key policies and objectives with respect to establishing and maintaining Community Separators and could adversely impact the following:
    - Agricultural Resources
    - Open Space Resources
    - Rare and Endangered Species
    - Wildlife and Biotic Resources
    - Groundwater Recharge

2. A detailed project description is needed that describes the scale, proportion, density, intensity, circulation, parking, and specific site improvements proposed <u>for all of the uses</u>, current and future phases included, for the entire 450 acre site. This level of detail is absolutely necessary to determine the range, level and degree of impacts that would occur as a result of the proposed project.

3. Traffic impacts related to use of Highway 101, including interchanges at Highway 101 that could be impacted such as at Railroad, Highway 116, Rohnert Park Expressway and Wilfred Avenue must be fully evaluated. Traffic impacts related to local streets and connector streets, such as Stony Point Road, must be included in this analysis. Traffic impacts must be evaluated and information provided regarding the following: existing level of service (LOS); LOS assuming project and reasonably foreseeable other projects; LOS assuming project, reasonably foreseeable other

projects and identified improvements; and, build out conditions, with project and identified improvements.

4. Water Resource and Wastewater Treatment/Disposal impacts. The County has limited resources to accommodate future development County-wide. The use of water and the treatment and disposal of wastewater related to this proposal must be evaluated. Water usage and wastewater disposal and/or treatment needs of this proposal could restrict development opportunities elsewhere in the County. This is particularly significant, given the proposed site is in a "Community Separator" and outside of areas anticipated for urban growth within the County of Sonoma General Plan.

5. Fiscal and Economic impacts/Public Services impacts. The proposed Casino would occupy only a portion of the overall 450-acre site identified. It is absolutely necessary to have information in terms of a complete project description for the entire site so that cumulative impacts of this proposal can be evaluated. It is likely that local communities will be providing a wide-range of supportive services, from police to housing to mental health to administrative without revenues to support this increase in demand for services. Mutual aid agreements will require that personnel and equipment be used to backup other jurisdictions (i.e., Rohnert Park) that may provide direct services to the Casino project. In addition, full development of the entire site would likely include retail stores, services, restaurants, overnight accommodations, etc. that would draw revenue from local businesses, such as local Cotati businesses. Sales tax and other related business/development revenues would be lost to local communities, including the City of Cotati.

6. Crime impacts. The proposed Casino is likely to bring with it related crime impacts. The addictive nature of gambling often is correlated with increases in alcohol and drug abuse, domestic violence, child neglect, burglary and fraud.

7. Housing impacts. The proposed Casino and other uses associated with this proposal would create new jobs. Additional housing would be necessary to support the employees. The County of Sonoma has a significant need for housing, particularly housing affordable to lower income groups. The impacts of housing associated with this proposal must be assessed and satisfactorily addressed for all income groups. It is not acceptable to rely on surrounding communities to satisfy the identified housing needs for this proposal.

8. Laguna de Santa Rosa impacts. The adjoining Laguna de Santa Rosa is the second largest freshwater estuary in northern California. The possible loss of the proposed project site to development could have significant adverse impacts on the overall ecological health of this significant resource. The open space, infiltration and habitat value of this "Community Separator" site to the health of

the Laguna de Santa Rosa must be evaluated and mitigated. Mitigation options must include alternative sites.

9. Lighting and Visual impacts. The proposed Casino project and related development could have significant and adverse lighting and visual impacts, given the amount (number and intensity) of exterior lights and general design that could be proposed.

10. Cumulative and Indirect impacts. The DEIS must evaluate the cumulative impacts of this proposal, including the anticipated overall development anticipated for the entire site. In addition, the DEIS must evaluate the indirect impacts of proposed mitigation measures for the identified direct impacts related to this proposal.

11. The DEIS must consider alternative sites and site development options in terms of a range of intensity of uses and related levels of impacts.

The City of Cotati has strong concerns that this proposed project is not fully defined. There appears to be an attempt to segment the project and not provide full information and, correspondingly, not identify and address all possible impacts of the development of the 450-acre site. The City of Cotati would likely be the local Sonoma County community most impacted by this proposal. Consequently, the City requests a full, open and constructive dialogue on this matter, and an outcome that identifies the most appropriate site for such a use with responsible mitigation ensured.

Thank you for the opportunity to comment on the Graton Rancheria Casino Proposal. Should you have any questions regarding the comments provided above, please contact me at 707/665-3638.

Sincerely,

David Woltering, AICP
Planning Director
City of Cotati

cc:

City Council
City Manager
City Attorney

LAW OFFICES
GILCHRIST & RUTTER
PROFESSIONAL CORPORATION

WILSHIRE PALISADES BUILDING
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SANTA MONICA, CALIFORNIA 90401-1000

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March 29, 2004

VIA FEDERAL EXPRESS

Attn: Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW
9th Floor
Washington DC 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino and Hotel Project ("Project")

Ladies and Gentlemen:

This letter is written in connection with the "Notice of the National Indian Gaming Commission of Intent to Prepare an EIS pertaining to the Federated Indians of Graton Rancheria Casino and Hotel Project". According to such notice, the National Indian Gaming Commission ("NIGC") is gathering information necessary for the preparation of an EIS in cooperation with the Federated Indians of Graton Rancheria ("FIGR") and the Bureau of Indian Affairs, and that written comments on the scope of the EIS will be accepted up to April 1, 2004.

We represent the Rancho Verde Mobile Home Park ("Mobile Home Park"), which is located at 750 Rohnert Park Expressway, Rohnert Park, California 94928. The Mobile Home Park is situated immediately adjacent to, and borders along the east side of, the proposed location of the Project. The Mobile Home Park is comprised of approximately 1,100 residents and 300 mobile homes.

On behalf of the Mobile Home Park, we respectfully request that the NIGC take into consideration the following matters in connection with preparation of the EIS:

1. Flooding.

During the last several years, the Mobile Home Park has experienced flooding that has affected up to 50% of its residents. According to Todd Engineers, who were retained by the Mobile Home Park to study this problem, the major reason for the flooding is overflowing of existing waterways and channels (caused in part by water backing up from the Laguna de Santa Rosa – a dry riverbed located downstream, overgrown vegetation, sedimentation build up and lack of county maintenance) from increased flows of storm water run off. These existing waterways and channels lie outside of the boundaries of the Mobile Home Park.

2004 MAR 30 PM 1:08
NATIONAL INDIAN GAMING COMMISSION

In light of the plans for the Project and because of the Mobile Home Park's history of flooding, the Mobile Home Park also asked Todd Engineers to evaluate the impact that the Project might have on flooding within the Mobile Home Park and to work with the FIGR to make sure that construction of the Project would not increase flooding problems at the Mobile Home Park. Among other things, Todd Engineers studied the flood control channel maps of the Sonoma County Water Agency and documents of the Federal Emergency Management Agency pertaining to the location of the Project and the Mobile Home Park. Their study indicated that the proposed location of the Project lies within a 100-year flood plain although the Mobile Home Park does not lie within such a flood plain.

To mitigate the potential impact of the Project on storm drainage resources within the area of the Mobile Home Park and the Project, Todd Engineers has recommended that the Project include construction of a storm water retention basin or flood wall. If such a storm water retention basin or flood wall is not constructed, Todd Engineers has advised that there is a strong likelihood of exasperating the flooding problems experienced at the Mobile Home Park since the Project is likely to cause increased flows of storm water run off into adjacent waterways and channels overflowing them and thereby causing further flooding at the Mobile Home Park.

Based upon the above information, the EIS needs to study the current flooding conditions, the reasons the problems currently exist, the potential adverse effects of the construction of the Project on water flow and flooding and determine what requirements need to be imposed to mitigate these problems.

2. Traffic; Ingress and Egress.

The only entrance to the Mobile Home Park is from the Rohnert Park Expressway ("RP Expressway"). It is our understanding that the Project will be located west of, and immediately adjacent to, the Mobile Home Park and that one of the entrances to the Project may be via the RP Expressway. From the 101 Freeway, which is east of the Mobile Home Park, the RP Expressway is comprised of a total of four lanes, however as it approaches the Mobile Home Park it narrows into only two lanes. The RP Expressway is already a very busy thoroughfare and residents of the Mobile Home Park already have great difficulty entering and exiting the Mobile Home Park to and from the RP Expressway.

The RP Expressway curves as it passes the Mobile Home Park and this adds to the difficulty of residents entering and exiting the Mobile Home Park. Unfortunately, there is no traffic light at the entrance of the Mobile Home Park onto the RP Expressway regulating traffic flows for safer ingress and egress to and from the Mobile Home Park. School buses picking up and dropping off children at the RP Expressway entrance to the Mobile Home Park significantly contribute to the levels of traffic congestion and danger along this portion of the RP Expressway.

The current construction of an apartment complex immediately adjacent to, and bordering the east side of, the Mobile Home Park is expected to further increase traffic flows along this location of the RP Expressway.

Given this situation, the Mobile Home Park has consulted with TJKM Transportation Consultants ("TJKM"), traffic engineers, concerning the impact the Project will have on traffic conditions in this location. Assuming that the Project is built west of the Mobile Home Park and given its proximity further west of the 101 Freeway than the Mobile Home Park, TJKM has advised that it is reasonable to expect significantly increased traffic passing by the Mobile Home Park heading west on the RP Expressway, increased difficulty for residents exiting and entering the Mobile Home Park, and increased dangers to children leaving and entering school buses at this entrance to the Mobile Home Park.

To mitigate the impact on the Mobile Home Park of increased traffic from the Project, TJKM and the Mobile Home Park have recommended that the RP Expressway be widened at this location, and that an on-demand activated traffic light be installed at the Mobile Home Park entrance and exit off the RP Expressway location. In addition, the Mobile Home Park has recommended the widening of the RP Expressway to four lanes from the point where it narrows to two lanes (this is as you approach the entrance to the Mobile Home Park) to the point where the RP Freeway crosses Stoney Point Road, which boarders the west side of the proposed location of the Project. The RP Expressway would then be a four lane thoroughfare running from the 101 Freeway, past the Mobile Home Park and the Project, to Stoney Point Road. Also, to reduce congestion and enhance safety, a transition lane should be added to the RP Expressway for vehicles exiting the Mobile Home Park and accessing the RP Expressway headed east.

Because the only entrance and exit for vehicles to the Mobile Home Park is via the RP Expressway and the Project is likely to generate significantly more traffic along this already congested section of the RP Expressway, the ingress and egress of fire and other emergency vehicles to and from the Mobile Home Park is a major concern. To address this concern, an alternative access road into the Mobile Home Park should be integrated into and made a part of the design and construction of the Project. Such access road could connect to either Wilfred Avenue (which borders the north side of the Project location) or Stoney Point Road (which borders the east side of the Project location) through the Project site and connect to the Mobile Home Park as an alternative means of ingress and egress to and from the Mobile Home Park.

3. Noise and Light.

Due to the significant size of the Project (which includes, among other things, a 2,000 slot casino, 300-room hotel, numerous other entertainment venues, spa and resort amenities and numerous large parking lots) and its location immediately adjacent to the Mobile Home Park

together with its late-hours of operation, it is expected that the residents of the Mobile Home Park could be materially affected by noise and light emanating from the Project. The Mobile Home Park is desirous that steps be taken to mitigate these impacts on the Mobile Home Park residents as much as possible. To address these concerns, as part of the design and construction of the Project, a wall together with landscape barriers (comprised of trees and bushes of sufficient quality and quantity) needs to be constructed along that part of the Project which borders the Mobile Home Park. Such a wall, if of sufficient height, together with appropriate landscape barriers would serve as both sound and light barriers absorbing to some degree the sound and light emanating from the Project. The construction of such a wall would also address some of the security concerns associated with operation of the Project immediately adjacent to the Mobile Home Park.

In addition, the Project should incorporate setbacks of sufficient distance along that side of the Project which borders the Mobile Home Park. This would serve to further mitigate the impact of sound and light emanating from the Project.

Request is hereby made that the foregoing matters be included as part of the EIS pertaining to the Project. If you have any questions concerning these matters, please do not hesitate to contact the undersigned.

Very truly yours,

GILCHRIST & RUTTER
Professional Corporation

Duane M. Montgomery
For the Firm

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3402.005

cc: Mr. William C. Allan, U.S. Department of the Interior
Carl Eric Leivo, City Manager, City of Rohnert Park
Ms. Anne James, James & Associates, Inc.
David Spangenberg, Esq., Law Offices of David Spangenberg
Mr. Raymond K. Will, Todd Engineers
Richard H. Close, Esq., Gilchrist & Rutter

March 16, 2004

To: Ms. Christine Nagle, NEPA Coordinator
Nation Indian Gaming Commission
1441 L Street, NW 9th Floor
Washington, D.C. 20005

From: John E. King
8617 Petaluma Hill Road
Penngrove, Ca 94951
707-763-7023
penngrove@sonic.net

Re: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

Please date stamp all 5 pages of this document only and return mail it to me – it will serve as my receipt of the documents enclosed in this package. These pages are photocopies of the cover pages only of the enclosed documents.

The documents include:

1) Weston Benshoof Letter dated March 10, 2004
2) Dr. Steven F. Carle Letter dated March 9, 2004
3) O.W.L. Foundation Letter – H.R. Downs dated March 10, 2004
4) Rohnert Park General Plan E.I.R. – May 2000
5) DVD – Sierra Club Meeting February 2004

Thank you,

John E. King

2004 MAR 17 AM 9:45

John E. King (letter 741)

This submission also included one copy of the DVD entitled “Sierra Club Meeting, February 2004”.

WESTON BENSHOOF
ROCHEFORT RUBALCAVA MACCUISH LLP
ATTORNEYS AT LAW

(213) 576-1005
ecasey@wbcounsel.com

March 10, 2004

VIA U.S. MAIL

19 PAGES

Ms. Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW 9th Floor
Washington, D.C. 20005

Re: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

This firm represents the O.W.L. Foundation ("O.W.L."). O.W.L. is a non-profit organization that advocates for responsible public decision making when agencies take actions that may have significant impacts on scarce natural resources such as open space and local groundwater supplies.

These scoping comments and related information are submitted in opposition to the proposed Graton Rancheria Casino Project (the "Casino Project"). In addition to the many other social and environmental concerns being voiced against the Casino Project, it should not be approved because it is proposed for development in an area of Sonoma County where groundwater supplies are already being critically overdrafted.

The simple fact is that a sufficient and sustainable water supply does not exist to serve the proposed Casino Project in addition to existing and future water needs in the area. The prevailing water crisis for this area of Sonoma County has been acknowledged by various public agencies, including, but not limited to, the Sonoma County Water Agency and the City of Rohnert Park, and is well documented by the records and information that are submitted herewith by reference for inclusion in the public record that your agency is assembling in connection with the proposed Casino Project.

Prior to taking any action with respect to the Casino Project, your agency should review, at a minimum, and in no particular order, the following documents

ROHNERT PARK GENERAL PLAN

Our Place... Rohnert Park 2020

A PLAN FOR THE FUTURE

REVISED DRAFT ENVIRONMENTAL IMPACT REPORT

SCH NO. 99062114

Date of Release May 5, 2000
Comments Due June 19, 2000

MAY 2000

John E. King

P.O. Box 127
Penngrove, CA 94951
penngrove@sonic.net
707-763-7023

ROHNERT PARK G

Our Place ... Rohn

A PLAN F

REVISED DRAFT ENVIRONMENTAL IMPACT REPORT

SCH NO. 99062114

Date of Release May 5, 2000
Comments Due June 19, 2000

MAY 2000

WESTON BENSHOOF
ROCHEFORT RUBALCAVA MACCUISH LLP
ATTORNEYS AT LAW

(213) 576-1005
ecasey@wbcounsel.com

March 10, 2004

VIA U.S. MAIL

Ms. Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW 9th Floor
Washington, D.C. 20005

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Prior to taking any action with respect to the Casino Project, your agency should review, at a minimum, and in no particular order, the following documents

relating to the prevailing local and Countywide water supply scenario to determine whether the Casino Project has the potential to cause negative impacts to the human environment:

- Entire administrative record for the Sonoma County Water Agency Water Supply and Transmission System Project (an exemplar table of contents for the administrative record is included herewith as Attachment A), including, but not limited to:
    - The proposed New Master Water Supply Agreement.
    - Eleventh Amended Agreement for Water Supply.
    - Tenth Amended Agreement for Water Supply and Construction of the Russian River-Cotati Intertie.
    - All prior amendments to the Water Supply Agreement.
    - Supplemental Water Supply Agreement.
    - 2001 Memorandum of Understanding Regarding Water Transmission System Capacity Allocation During Temporary Impairment.
- All other files held by the Sonoma County Water Agency concerning water quality and water supply issues, including, but not limited to, files concerning:
    - All past and present Water Contractor Agreements and other water supply contracts, agreements, and documentation, including those relating to Warm Springs Dam;
    - Available and forecasted surface and ground water supplies.
    - Land surface deformation (i.e., subsidence and uplift).
    - Designated areas of natural recharge.
    - Groundwater level data.
    - Water quality data regarding the Laguna de Santa Rosa wells.

- Water pollution, contamination, and toxicity.
- Historic and current water quality monitoring data.
- Flood data, floodplain maps, and flood control projects.

- 2000 Sonoma County Urban Water Management Plan.
- "Evaluation of Groundwater Supply Alternatives Water Supply and Transmission Project" prepared for the Sonoma County Water Agency by Parsons Engineering Science, Inc. (1995).
- All files held by the Sonoma County Health Department concerning studies, reports, and complaints regarding areas of contaminated water, and water contamination, degradation, pollution, or toxicity in Sonoma County water supplies, including Well Drillers Reports on water quality.
- All files held by the California Department of Health Services concerning studies, reports, and complaints regarding water quality of Sonoma County water supplies.
- All files held by the Sonoma County Permit and Resource Management Department concerning available water supplies and water quality concerns, including, but not limited studies, reports, evaluations, determinations, and Well Drillers Reports.
- All files held by the California State Department of Water Resources concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.
- All files held by the United States Geological Survey concerning overdraft of groundwater supplies and water level data in the Santa Rosa Plain Groundwater Basin, groundwater degradation, contamination, pollution, and water quality in the Santa Rosa Plain Groundwater Basin, and areas of natural recharge, land surface deformation, and seismic activity issues in the Santa Rosa Plain Groundwater Basin.

- United States Geological Survey "Map Showing Ranges in Probable Maximum Well Yield from Water-Bearing Rocks in the San Francisco Bay Region, California" (1972)(D.A. Webster, Miscellaneous Field Studies May, MF-431).

- United States Geological Survey "Groundwater Atlas of the United States, California and Nevada" (2003) (http://ca.water.usgs.gov/groundwater/gwatlas/reference/index.html).

- All contracts by the United States Geological Survey, County of Sonoma, and Sonoma County Water Agency for all studies and evaluations of surface and groundwater supplies in Sonoma County.

- The Sonoma County General Plan.

- Entire administrative record concerning the Sonoma County General Plan Update for Year 2020, including all documents and public testimony regarding the Water Resources Element.

- All files held by the City of Rohnert Park concerning the City's General Plan, Specific Plans, and all related amendments in relation to City water supplies and water quality, the 2000 Final Environmental Impact Report prepared for the City's 2000 General Plan (including studies, evaluations, and consulting work prepared in connection with the 2000 FEIR in relation to City water supplies, such as the study performed by PES Environmental, Inc.), City groundwater well logs, land surface deformation (i.e., subsidence and uplift), water level data, water quality data, the City's letter request to the Sonoma County Water Agency to implement a Groundwater Management Plan (dated October 22, 2002), and the Sonoma County Water Agency's letter denial to implement a Groundwater Management Plan (dated November 26, 2002).

- The 1984 Penngrove Specific Plan.

- Entire administrative record and resulting Settlement Agreement relating to the 2002 Sonoma County Superior Court case entitled South County Resource Preservation Committee and John E. King v. City of Rohnert Park, Case No. 224976.

- Entire administrative record concerning the City of Santa Rosa Board of Public Utilities Incremental Recycled Water Program, including, but not

limited to, all resolutions, environmental documentation, studies, reports, public comment, and presentations.

- Year 2001 Senate Bills 221 and 610 (codified at relevant provisions of the California Government, Public Resources, and Water Codes).
- The 2003 Kleinfelder Report prepared for the Sonoma County Water Agency addressing water scarce areas of Sonoma County including Bennett Valley, Mark West Springs, and Joy Road Area.
- The published Court of Appeal decision in Friends of the Eel River, et al. v. Sonoma County Water Agency, et al. (2003) 108 Cal.App.4th 859.
- August 11, 2003 letter from the General Manager of the Sonoma County Water Agency to Water Contractors in response to the Friends of the Eel River decision.
- DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center, John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker.
- February 24, 2004 letters from John King, the Brandt Hawley Law Group, and the lawfirm of Weston, Benshoof, Rochefort, Rubalcava & MacCuish to the City of Rohnert Park in opposition to the City's proposed Resolution No. 2004-34.
- March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.
- "Santa Rosa Plain Ground Water Model" – California Department of Water Resources (1987).
- "Meeting Water Demands in Rohnert Park" – California Department of Water Resources, Central District (1979).

- "Geology & Groundwater in the Santa Rosa and Petaluma Valley Areas" – California Department of Water Resources and United States Department of Interior (1958)(G.T. Cardwell).
- "Statement on Groundwater Conditions in Santa Rosa, Petaluma, and Sonoma Valleys, Sonoma County, CA" – United States Department of the Interior – Geological Survey – Groundwater Branch (1955)(AR Leonard and G.T. Cardwell).
- "Groundwater Basins of California, a Report to the Legislature in Response to Water Code Section 12924" (1980).
- "Bulletin No.118 – 4, Volume 1: Geologic & Hydrologic Data 1975; Volume 2: Evaluation of Groundwater Resources Sonoma County, Santa Rosa Plain 1982; Volume 3: Petaluma Valley 1982" – California Department of Water Resources.
- "Groundwater Management in California" – California Department of Water Resources (1999).
- "Bulletin 118 Update" – California Department of Water Resources (2003).

In addition to the wealth of other information that is available for review and consideration by your agency, the information contained in the foregoing documents demonstrates that a sufficient water supply is not available to serve the proposed Casino Project and that the project would cause significant impacts to scarce natural resources in the proposed development area.

Please note that, in addition to a copy of this letter, the O.W.L. Foundation will submit hard copies of the following three items at the March 10, 2004 public scoping meeting to be held in Sonoma County:

(1) 2000 Environmental Impact Report for the City of Rohnert Park General Plan and Urban Growth Boundary ballot measure;

(2) DVD produced by the O.W.L. Foundation, memorializing the Sierra Club Groundwater Forum conducted on February 19, 2004 at the Environmental Center in Santa Rosa, California, featuring speakers Brock Dolman of the Occidental Arts and Ecology Center, John King of the O.W.L. Foundation, and environmental attorneys Edwin Wilson and Stephen Volker; and

(3) March 9, 2004 letter from Dr. Steve Carle to Christine Nagle regarding DEIS Scoping Comments for the proposed Graton Rancheria Casino Project.

Thank you for your review and consideration of these comments and all documents submitted to the record by reference herein.

Very truly yours,

Peter E. Garcia
WESTON BENSHOOF
ROCHEFORT RUBALCAVA & MacCUISH LLP

EJC/peg
Enclosures: (1)
cc: H.R. Downs, President, O.W.L. Foundation

WATER SUPPLY AND TRANSMISSION SYSTEM PROJECT

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March 9, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington, DC 20005
Telephone (202) 632-7003

Subject: Hydrologic impacts related to proposed casino resort project west of Rohnert Park, California

For: **DEIS Scoping Comments, Graton Rancheria Casino Project**

Dear National Indian Gaming Commission:

Hydrology is an important to subject to consider in planning a large project. The casino resort project proposed by Station Casinos and the Graton Rancheria tribe may produce significant hydrologic impacts to the environment, particularly to water quantity, land surface subsidence, water quality, and floodplains.

Water Quantity

In May 2003, the Graton Rancheria tribe and Station Casinos decided to pursue a location west of Rohnert Park for its proposed casino resort project.

Also in May 2003, the U.S. Dept. of Interior (DOI), the Federal Agency within which the Bureau of Indian Affairs (BIA) resides, classified Sonoma and Marin Counties as areas with "Potential Water Supply Crises by 2025" having "conflict potential" rated as "substantial" (see Figure 1). This DOI classification rates Sonoma and Marin Counties on a conflict level comparable to the water wars of the Klamath Basin (California, Oregon) and the Los Angeles and San Diego metropolitan areas in southern California. Since May 2003, "conflict potential" has heightened immensely in Sonoma County. The proposed casino resort location west of Rohnert Park could hardly be a worse choice for avoiding a "water supply crisis" within Sonoma County.

- How will the Graton Rancheria project impact the high degree of conflict potential over water supplies in Sonoma County (as already recognized by DOI before the proposed Graton Rancheria casino project)?

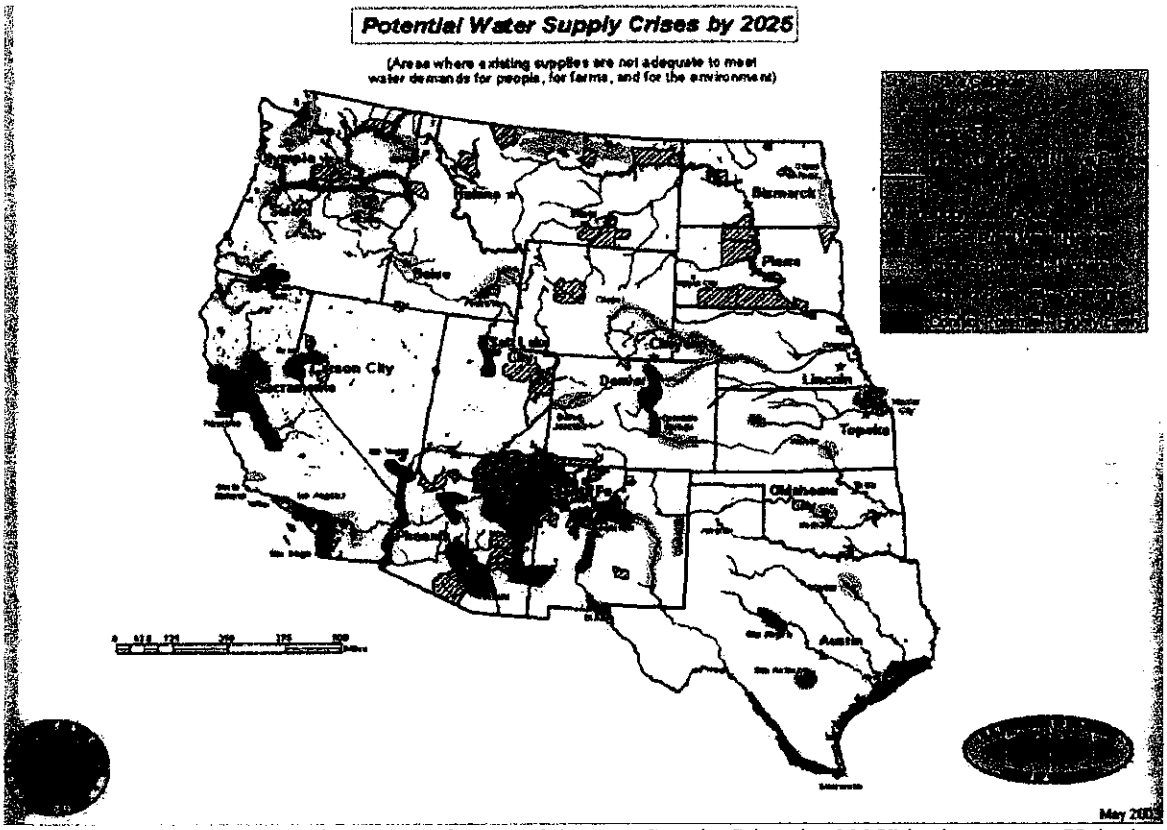

Figure 1. U.S. Dept. of Interior's map of "Potential Water Supply Crises by 2025" in the western United States.

Also in May 2003, the Friends of the Eel River Appeals Court Decision struck down the "planned" 35% increase in Russian River water rights by the Sonoma County Water Agency (SCWA). These water rights increases were intended to meet urban growth projections for cities in Sonoma and Marin, including (but not limited to) Santa Rosa, Petaluma, Rohnert Park, and Novato.

- In light of the May 2003 Friends of the Eel River Appeals Court Decision, how will the Graton Rancheria project impact the inevitable "water supply crisis" that Sonoma County is destined to face?

In fact, Rohnert Park's General Plan urban growth projections through 2020 were based on the now obsolete and erroneously (see SCWA 2000) "planned" assumption of more than tripling SCWA allocations from 4.8 million gallons per day (mgd) in 2000 to 15 mgd "commencing not later than 2010" (RP, 2000). Presently, Rohnert Park's allocation of SCWA water supplies is not secured, and future increases are in jeopardy. The current estimate of Rohnert Park's SCWA allocation ranges between 4.3 and 4.9 mgd on a monthly basis with no increases during the dry season. Rohnert Park is already in a water supply crisis because its SCWA allocation is less than 1/3 of the amount assumed in its General Plan EIR. Rohnert Park must continue overdrafting the groundwater basin because it has no flexibility to bank excess SCWA water supplies in the wet season.

- How can groundwater supply impacts of the Graton Rancheria casino project combined with the City of Rohnert Park's continuing need to overdraft the

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groundwater basin ever lead to mitigation of overdraft conditions in the south Santa Rosa Plain?

As of 1999, Rohnert Park's water consumption was 6.9 mgd (RP 2000). Municipal pumping of groundwater remains the only means for making up the difference between water supply demand and limited SCWA allocations. Through a Stipulated Judgment resulting from the 2001 lawsuit brought forth by Penngrove residents against Rohnert Park's General Plan EIR, Rohnert Park's future groundwater pumping is limited to 2.3 mgd before any new development outside July 1, 2000 city limits can occur. Although water supply numbers do not add up, Rohnert Park still adheres to its General Plan calling for 25% population growth through 2020, with urban expansion mainly along the eastern corridor.

- How will the Graton Rancheria casino project honor the spirit of the 2002 Stipulated Judgment between the City of Rohnert Park and residents of Penngrove to limit new development outside July 1, 2000 Rohnert Park city limits until groundwater pumping is permanently reduced to below 2.3 mgd? (Obviously, the Graton Rancheria and the City of Rohnert Park have established a type of development agreement in their MOU.)

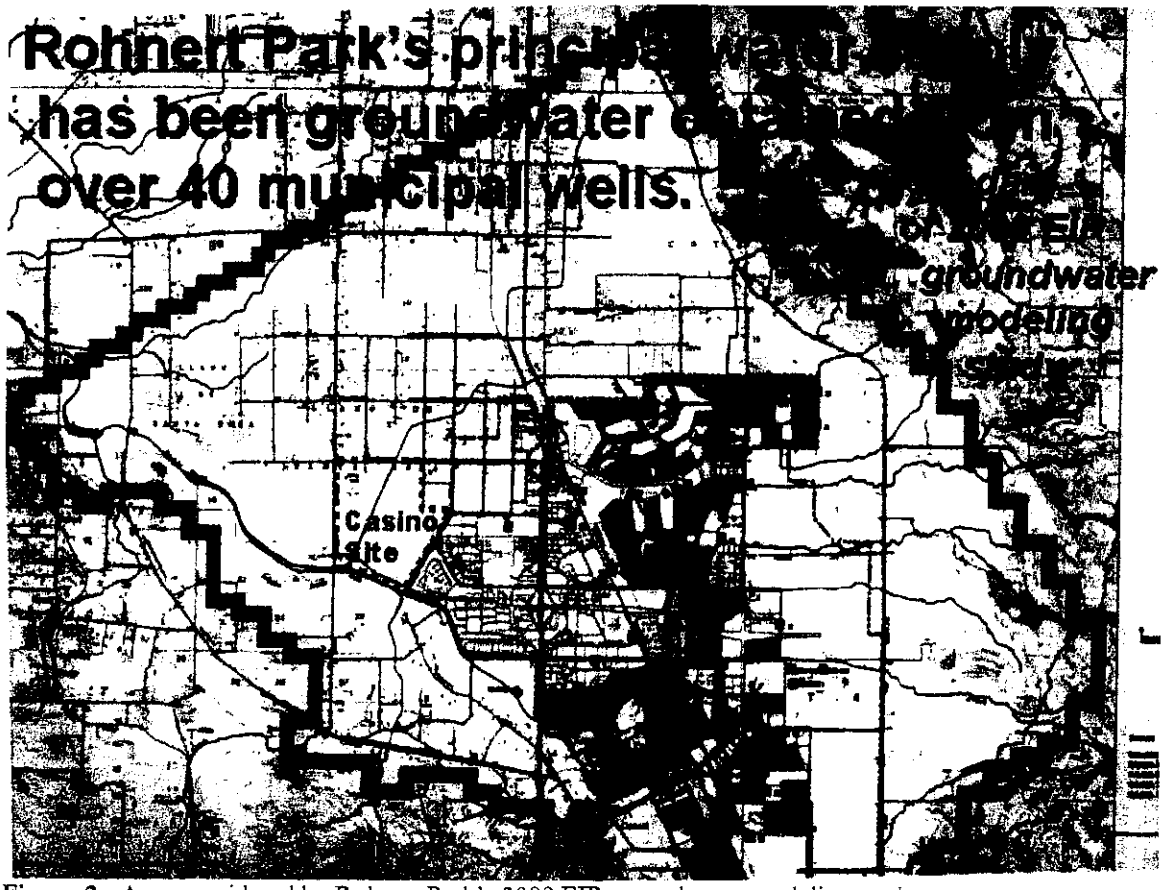

Figure 2. Area considered by Rohnert Park's 2000 EIR groundwater modeling study.

According to Rohnert Park's General Plan EIR (RP, 2000), the City of Rohnert Park has been over-pumping the aquifers within the blue line areas shown in Figure 2 since 1975.

Since 1984, groundwater overdraft by municipal pumping has exceeded natural recharge, on average, by over a factor of over 2.5, as shown in Figure 3. However, this graph does not include pumping in areas outside city limits including Sonoma State University, Cotati, Penngrove, and other unincorporated areas, which contribute to a total pumping rate of at least 5 mgd - over 3 times the recharge rate - within the blue line shown in Figure 2. The proposed casino resort project would substantially contribute to the ongoing groundwater overdraft problem. Since no responsible local governmental agency within Sonoma County has formulated any groundwater management plans recommended in State Law (DWR 1999; DWR 2003), there is no end in sight to the adverse impacts caused by the groundwater overdraft problem.

- How will the Graton Rancheria casino project affect Rohnert Park's ability to honor it's own General Plan Policy PF-E: "*Provide sufficient quantities of water for Rohnert Park residents and businesses while ensuring that safe yield is not exceeded*"?
- How will the Graton Rancheria casino project affect Rohnert Park's ability to honor it's own General Plan Policy PF-H "*Ensure that groundwater withdrawal does not exceed safe yield*"?
- How will the Graton Rancheria tribe and Station Casinos address the California State Water Code – including policies, laws, and financial support supporting groundwater management and integrated water resources management?

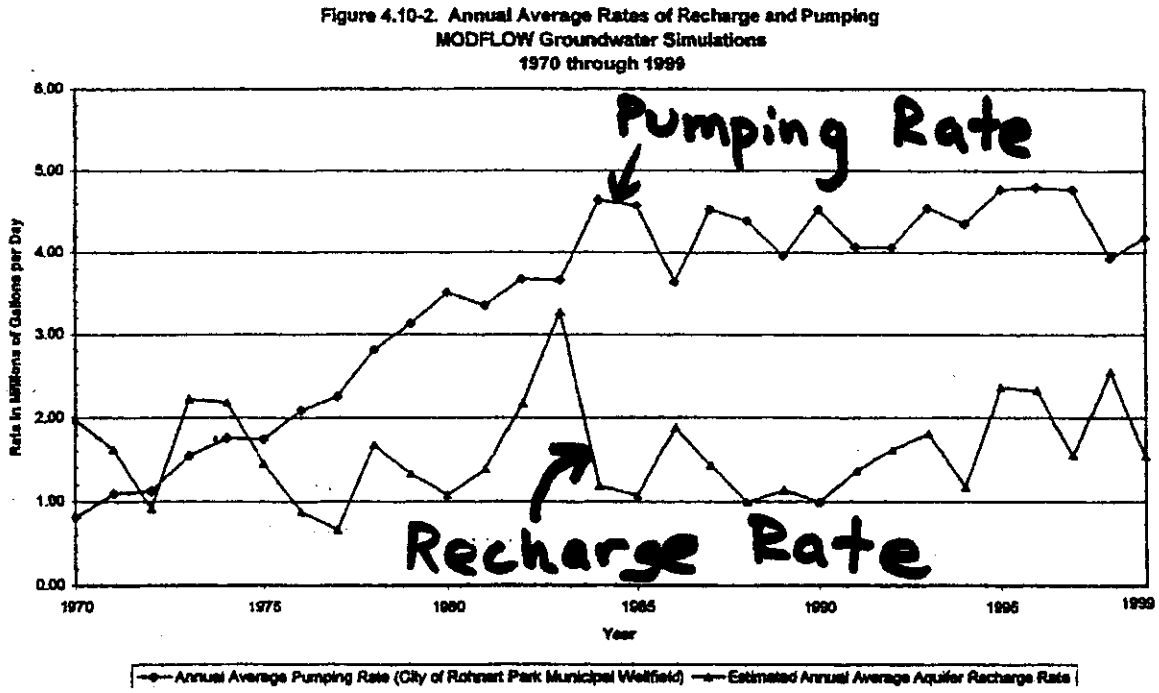

Figure 3. Comparison of Rohnert Park's municipal pumping rate to the annual average recharge rate (within the blue line area in Figure 2) between 1970 and 1999.

Groundwater overdraft within the blue line area has caused water level declines of 150 feet along the eastern boundary of Rohnert Park (RP 2000) and over 200 feet in areas within the city limits. Water levels to the west of Rohnert Park are also influenced by Rohnert Park's pumping, as indicated by the hydrograph in Figure 4 for a well very close

to the northeast boundary of the proposed casino site. There is no evidence to confirm that the aquifer materials beneath the casino site are somehow hydrologically isolated from other areas within the blue line boundary of Figure 2 by impermeable barriers such as aquitards or faults. Casino groundwater pumping would further contribute to the cumulative impacts of groundwater overdraft throughout the southern Santa Rosa Plain.

- How will the Graton Rancheria casino project mitigate the cumulative impacts of groundwater overdraft on declining water levels and quantity of groundwater supplies for other water users in the Santa Rosa plain, particularly City of Rohnert Park, Cotati, Sonoma State University, the community of Penngrove, industry, and agriculture?

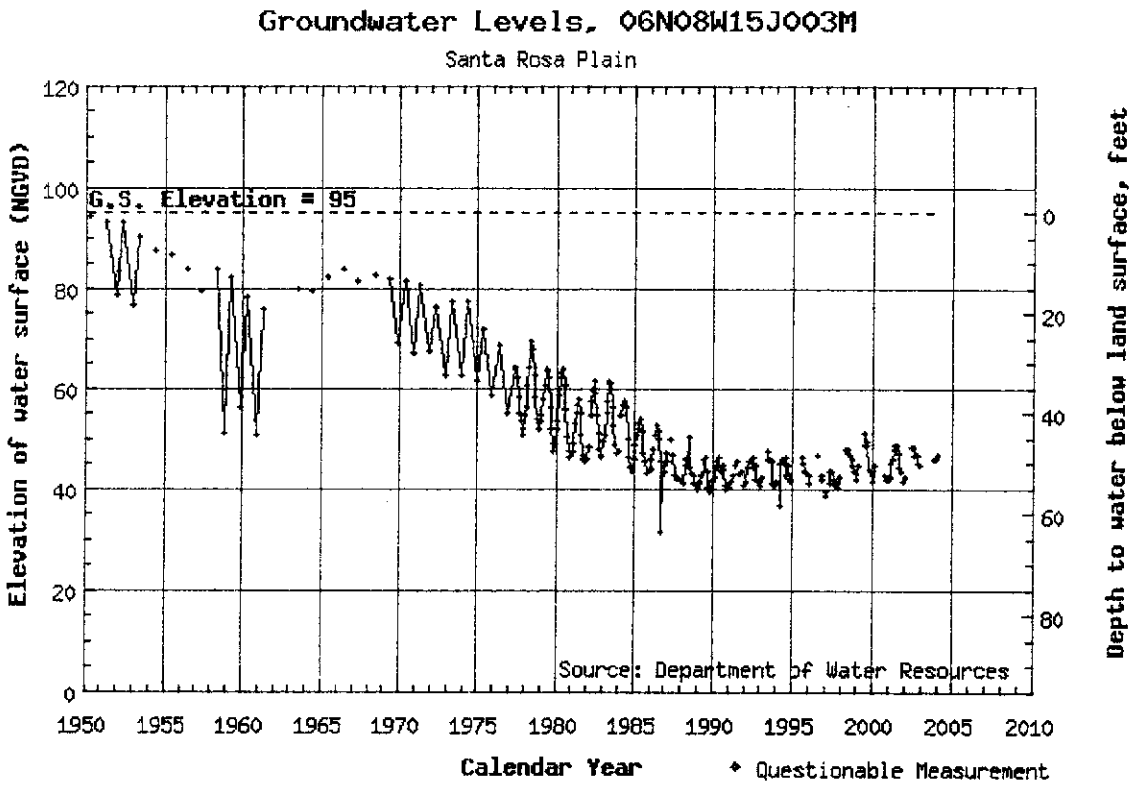

Figure 4. Hydrograph of groundwater levels in a well west of Rohnert Park and slightly northeast of the proposed casino site, showing drop in water levels between 1950 and present (from Calfornia DWR Water Data Library).

Recognizing the severity of the looming water supply crisis, Rohnert Park's city officials are presently attempting to circumvent the 2.3 mgd groundwater pumping restriction by redefining "average annual pumping rate" to an overall average through 2020 and "net consumptive use" of water supplies to double-count use of recycled water (City of Rohnert Park Resolution #2004-34).

- Will the Graton Rancheria and Station Casinos, through MOU's or any other means, support the City of Rohnert Park's attempts to circumvent legal restrictions on groundwater pumping?

Groundwater supplies for the southern Santa Rosa Plain, including Rohnert Park and the casino site, are mainly replenished to the east of Rohnert Park in "areas of natural recharge" mapped by the California Department of Water Resources (DWR, 1975) throughout Sonoma County (see Figure 5).

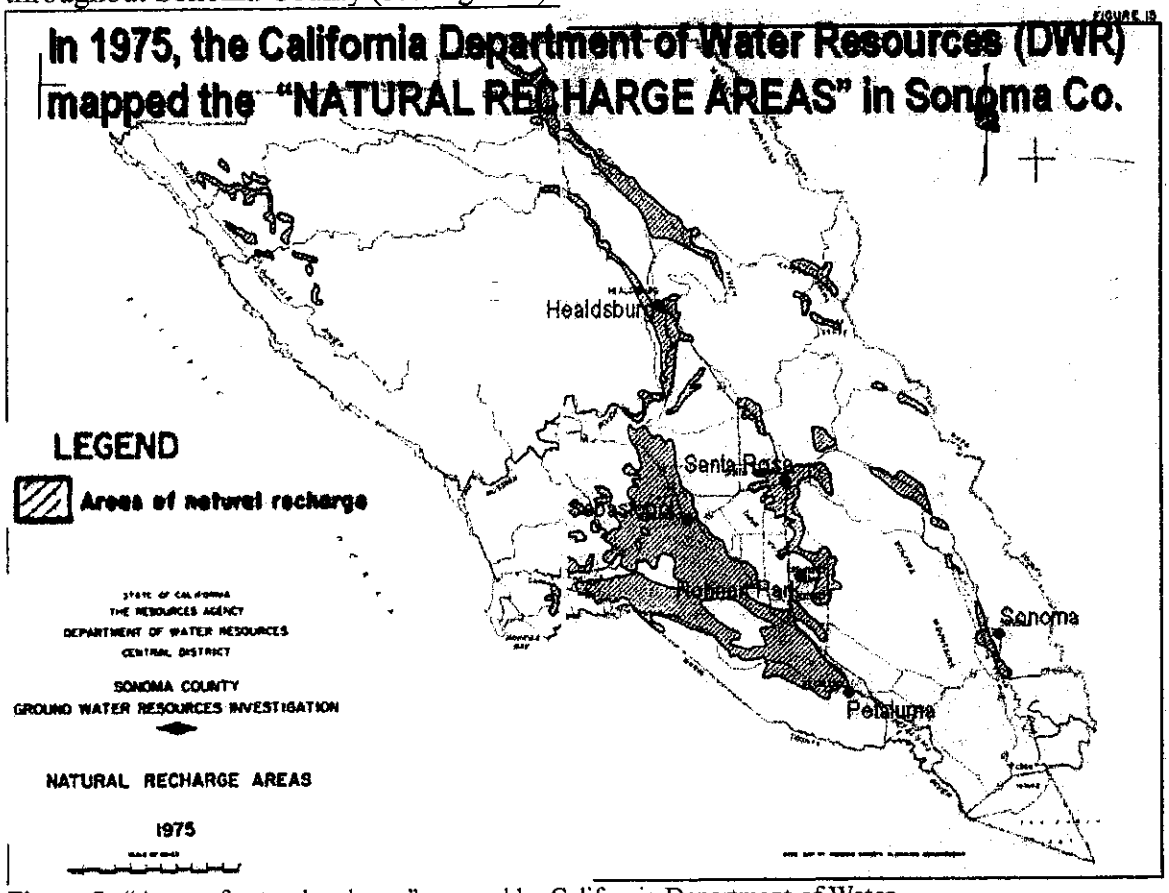

Figure 5. "Areas of natural recharge" mapped by California Department of Water Resources (DWR 1975).

The City of Rohnert Park's General Plan calls for urbanization of much of these areas of natural recharge (see Figure 6), which will increase storm water runoff and decrease recharge though increased use of impervious surfaces (DWR 2003). The resulting decrease in recharge will further exacerbate overdraft conditions.

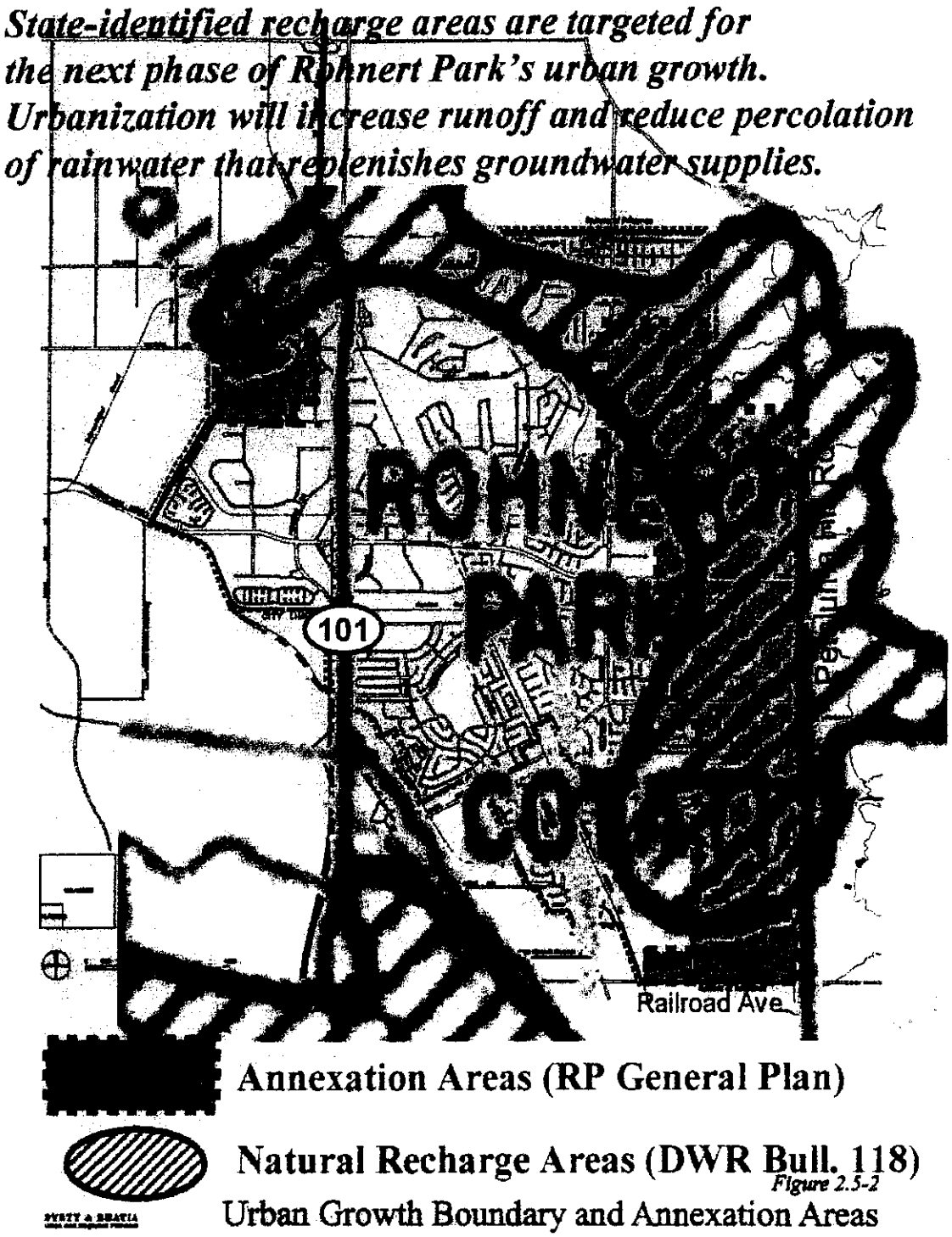

Figure 6. Map superposing DWR's mapped "areas of natural recharge" over Rohnert Park's annexation areas designated by its General Plan.

The long-term environmental impacts of continuing overdraft in the southern Santa Rosa Plain should be evaluated, with proper analysis of the sustainability of the groundwater

resource. Loss (or gain) of natural recharge through future development throughout the groundwater basin must be factored into analysis of impacts of groundwater withdrawals by the proposed casino project.

- How will declining natural recharge caused by urbanization of areas of natural recharge effect the sufficiency and sustainability of the groundwater supplies for the casino project and all other groundwater users in the south Santa Rosa plain?

Subsidence

The City of Rohnert Park and the proposed casino site are uniquely positioned over a thick accumulation of fine-grained "basin deposits" or "non-water yielding materials" that extend from the surface to depths as much as 240 feet, as shown in Figure 7 (DWR 1979). If groundwater is withdrawn at excessive rates, such fine-grained materials can compact irreversibly to produce permanent land surface subsidence. An engineering firm in contract with the SCWA has already pointed out the potential for land subsidence in Rohnert Park due to excessive groundwater pumping (Parsons Engineering Science, Inc, 1995). Such groundwater pumping-induced subsidence has occurred to great detriment in urban areas causing, for example, an estimated $300,000,000 damage (in 1998 dollars) in the Santa Clara Valley, California and inducing earth fissures in Las Vegas, Nevada (USGS 2001). The environmental impacts of groundwater level declines by excessive pumping within the areas of thick accumulations of fine-grained deposits beneath Rohnert Park and the proposed casino site should be properly evaluated to include consideration of subsidence.

- How does past and future overdraft by the City of Rohnert Park's municipal wellfield combined with casino project pumping effect land surface subsidence?
- What are the economic costs of land surface subsidence caused by excessive past and future groundwater pumping in the south Santa Rosa Plain?

FIGURE 9

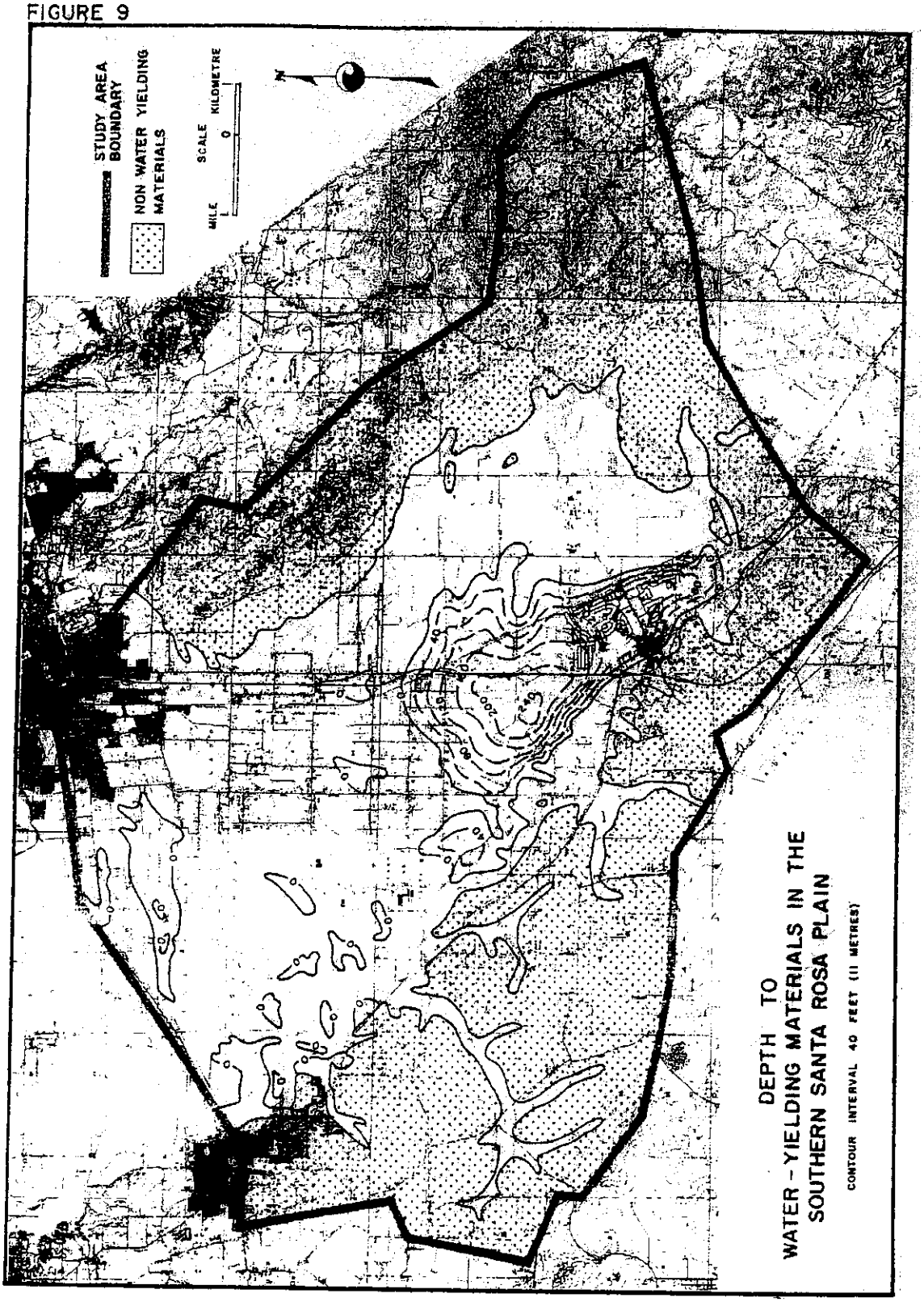

Figure 7. Map showing "depth to water-yielding materials in the southern Santa Rosa Plain," which is equivalent to the thickness of fine-grained "basin deposits" directly beneath the ground surface (DWR 1979).

Water Quality

Water quality may not appear, at first glance, to be an issue of concern for deep wells sited in the southern Santa Rosa Plain. However, many deep wells exhibit relatively high levels of arsenic (see Figures 8a-d). With EPA standards for arsenic being lowered from 50 to 10 micrograms per liter, many wells in the Santa Rosa Plain will no longer meet EPA or California drinking water standards. Decreasing water quality is another potential consequence of groundwater overdraft, as older and more mineralized water is drawn into wells that are pushed to greater depths as water levels decline. Although the proposed casino's well water quality may not exceed drinking water standards initially, casino wells would contribute to overdraft and, thus, will likely contribute to long-term degradation of groundwater quality for other groundwater users throughout the south Santa Rosa plain. The environmental impacts of continuing overdraft on water quality should be properly evaluated. Water *quantity* and *quality* issues are inter-related.

- How do tightened regulatory standards impact the future viability of groundwater supplies needed for new projects in the south Santa Rosa Plain, including the casino project?
- Will regional arsenic concentrations rise as a result of continued overdraft exacerbated by the casino project's groundwater pumping?
- Will overall groundwater quality decline as a result of continued overdraft exacerbated by casino pumping?

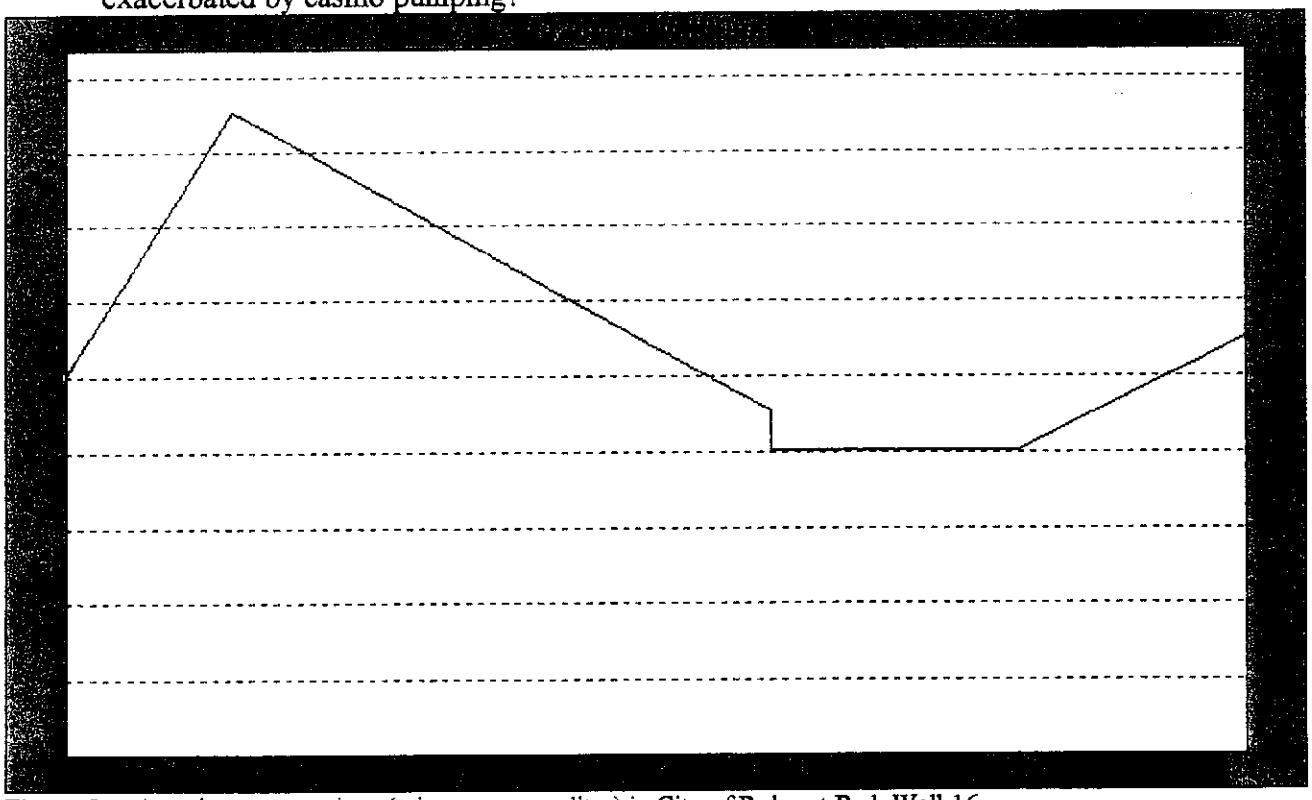

Figure 8a. Arsenic concentrations (micrograms per liter) in City of Rohnert Park Well 16 (from www.geotracker.swrcb.ca.gov).

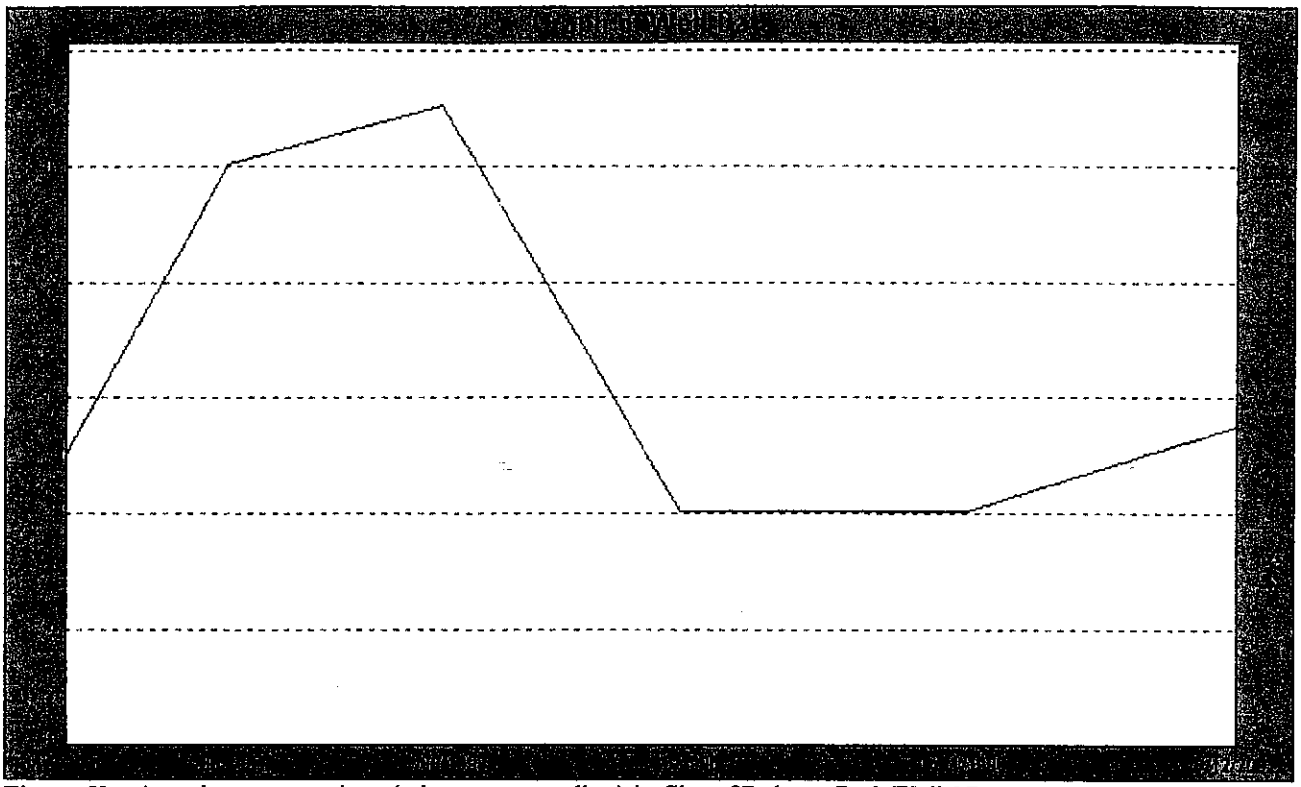

Figure 8b. Arsenic concentrations (micrograms per liter) in City of Rohnert Park Well 37 (from www.geotracker.swrcb.ca.gov).

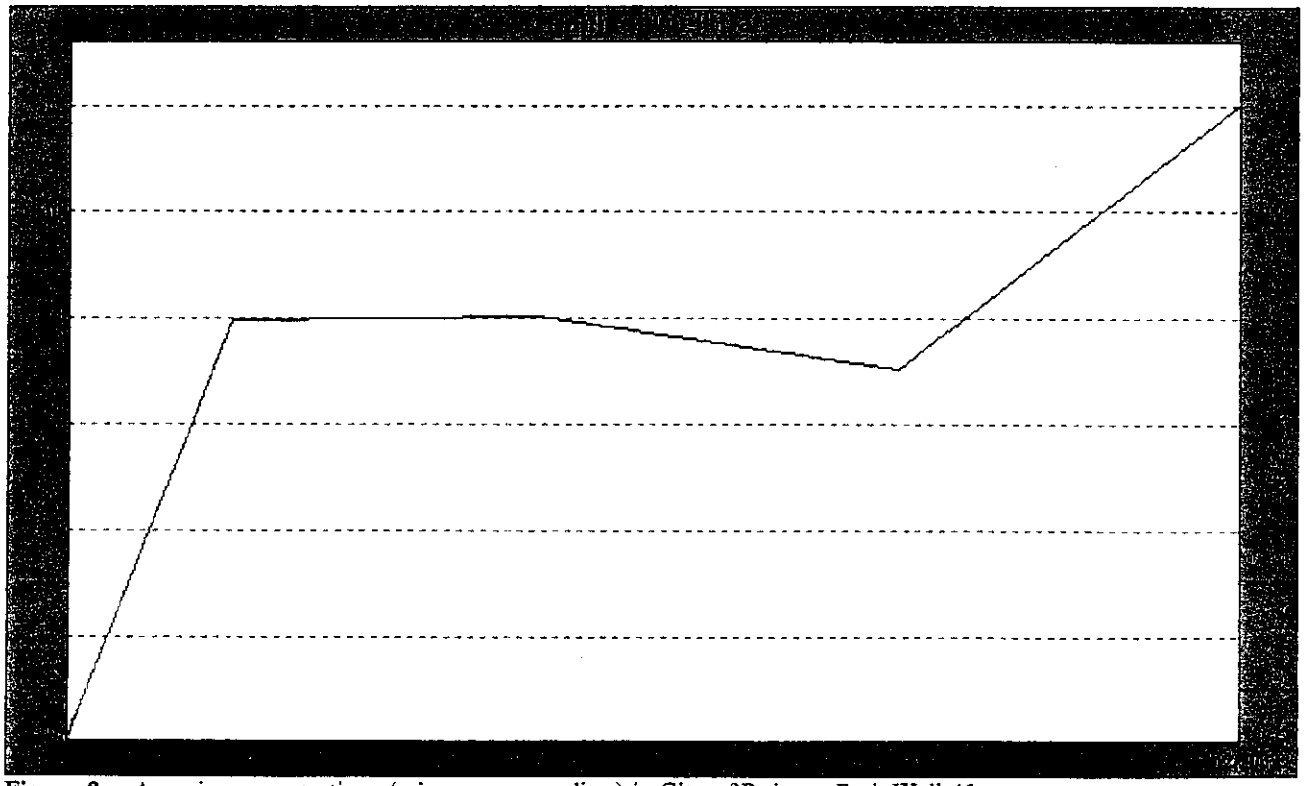

Figure 8c. Arsenic concentrations (micrograms per liter) in City of Rohnert Park Well 41 (from www.geotracker.swrcb.ca.gov).

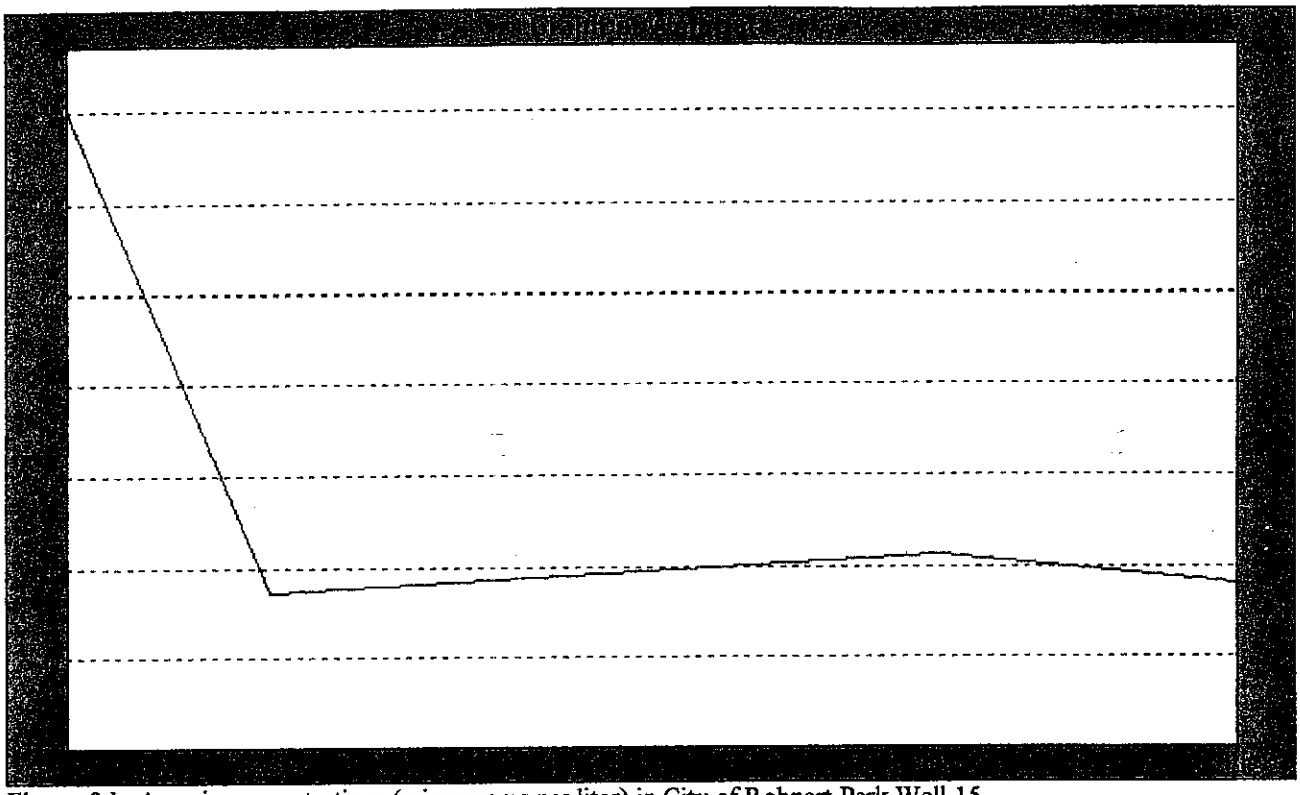

Figure 8d. Arsenic concentrations (micrograms per liter) in City of Rohnert Park Well 15 (from www.geotracker.swrcb.ca.gov).

Because the City of Rohnert Park now plans urban expansion into areas of natural recharge, new water quality threats are posed. Before 1999, city limits were largely contained above thick accumulations low-permeability fine-grained deposits, thus preventing migration of contaminant releases into groundwater. Recently, the City of Santa Rosa and the City of Rohnert Park now target the recharge areas of east of Rohnert Park for disposal of "recycled water." The new threat of groundwater contamination by urbanization of recharge areas should be properly evaluated, since the recharge areas are the source areas for the casino resort project's drinking water supply. Moreover, decreased natural recharge reduces inflow of younger and less-mineralized water and, therefore, further reduces water quality in the aquifers.

- How will changing land use in the areas of natural recharge effect future groundwater quality in casino project wells?

Floodplains

The casino resort project site resides within a 100-year floodplain. Propensity for flooding will be exacerbated by two groundwater overdraft-related factors:

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(1) Land surface subsidence has likely occurred in areas encompassing the casino resort project and much of the City of Rohnert Park as a result of ongoing groundwater overdraft conditions. Flood risk will increase in areas of subsidence because the ground surface elevation is declining relative to outlying areas.
(2) Urbanization of the areas of natural recharge, particularly in the areas to be annexed in Rohnert Park's General Plan, will cause less rainfall to percolate into the ground and more storm water runoff. Much of this increase in storm water runoff must be funneled across the casino resort project site into the Laguna de Santa Rosa watershed.

Environmental impacts to the floodplain should properly evaluate the two major effects of groundwater overdraft impacting the casino resort project site – land surface subsidence and increased storm water runoff from upstream urbanization.

- How will land surface subsidence caused by excessive groundwater pumping contribute to flood risk?
- How will increased storm water runoff caused by Rohnert Park urbanization increase flood risk in the Laguna de Santa Rosa floodplain, including the casino project site.?
- What is the economic impact of increased flood risk?

Conclusion

It is my understanding that the NEPA Environmental Impact Statement (EIS) should consider the inter-related issues regarding water quality, water quantity, and floodplains. Notably, the impacts of groundwater overdraft combined with urbanization – including dry wells, declining water quality, subsidence, and increased flooding – are difficult if not impossible to mitigate (particularly under the current local political power structure). The MOU between the City of Rohnert Park and the Graton Rancheria does nothing to mitigate these two parties' future hydrologic impacts within and beyond Rohnert Park city limits. I hope that the Federal Government will ensure proper evaluation of the potential environmental impacts that I have pointed out in this document.

Sincerely,

Steven F. Carle, Ph. D.
Penngrove, California

References

DWR (1975) "Evaluation of Groundwater Resources: Sonoma County (Volume 1: Geologic and Hydrologic Data)

DWR (1999), "Groundwater Management in California"
http://www.dpla2.water.ca.gov/publications/gwm_report.pdf

DWR (2003), "California's Groundwater" Update 2003 Bulletin 118
http://www.groundwater.water.ca.gov/bulletin118/index.cfm

Parsons Engineering Science, Inc (1995), "Evaluation of Groundwater Supply Alternatives Water Supply and Transmission System Project" prepared for Sonoma County Water Agency

RP (2000), Hydrology, Flooding, and Water Quality" section of the "Revised Draft Environmental Impact Report" City of Rohnert Park's General Plan 2020
http://www.penngrove.info/web-pix/pdf-files/rp_eir_groundwater.pdf

SCWA (2000), "Sonoma County Urban Water Management Plan 2000"
http://www.penngrove.info/web-pix/pdf-files/UrbanWaterManagementPlan2000.PDF

USGS (2001), "Land Subsidence in the United States", U.S. Geological Survey Circular 1182. http://water.usgs.gov/pubs/circ/circ1182/

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

March 10, 2004

15 PAGES

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, N.W.
9th Floor
Washington,
DC 20005

Dear Ms. Nagle;

Thank you for your attention to our previous communication, including the O.W.L. Foundation's policy statement regarding a proposed Indian gaming casino on land already demonstrated to be in groundwater overdraft. We strongly urge you to deny any such request because a water consumer of this magnitude would further exacerbate Sonoma County's dwindling water supplies. Furthermore, establishing a federal water right directly on top of a groundwater overdraft area automatically would create an inherently unstable legal climate. In fact, a host of reasons argue against this particular location as a suitable casino site; our legal arm is submitting an expanded list of these reasons to you.

In May 2003 the United States Department of the Interior (DOI) issued a dire warning to all residents of the American West regarding immanent drought and the likelihood of potential conflicts arising from drought. The DOI specifically singled out an area of northern California that includes all of Sonoma County as having a "substantial conflict potential".

As early as 1972, the United States Geological Survey (USGS) mapped "water adequacy yields" in Sonoma County. The USGS determined that groundwater yields for Rohnert Park were "inadequate for heavy industry, irrigation and municipal [use]". Despite this warning, groundwater pumping continued and levels plummeted by as much as 150 feet.

In 1987 the Department of Water Resources (DWR) identified a huge "cone of depression" centered on Rohnert Park. A cone of depression of this size indicates massive pumping with no regard for the need to replenish groundwater levels through natural recharge. Almost no remedial efforts have been mounted to alleviate negative draft. Unfortunately, surface water is no longer an option to balance this over drafted water budget.

A recent legal decision has put into motion the eventual restriction of Eel River waters that usually swell the capacity of the Russian River. The Russian River is the single greatest source of surface water and <u>also</u> of groundwater, through natural recharge, in Sonoma County. These looming restrictions of Eel River waters mean less surface water availability for water contractors who are serviced by the Sonoma County Water Agency (SCWA) aqueduct. With limits being reached on groundwater availability and now with limits being imposed on surface water availability, there will be no way to make up any deficiencies (and that includes the inevitable naturally occurring droughts).

P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

O.W.L. Foundation

President, H.R. Downs
Secretary, Deborah Hunt
Treasurer, Heidi Dieffenbach-Carle

www.Penngrove.Info

March 10, 2004

Ms. Christine Nagle
NEPA Coordinator
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1441 L Street, N.W.
9th Floor
Washington,
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P.O. Box 127 • Penngrove, CA 94951 • Tel. (707) 769-2008 • O.W.L.@Penngrove.Info

I am including copies of the DOI statement and a DOI map showing clearly that the entire area encompassing Rohnert Park already has a "substantial conflict risk". Please also find the 1972 USGS information on "water yield adequacy" that describes water yields for all of Rohnert Park as inadequate for heavy industry, irrigation and municipal use. It is important to note that in 1979, 16 wells supplied water to Rohnert Park. Today, Rohnert Park has 42 municipal wells, 31 of which are active.

I am also including a DVD record of a February 19, 2004 Groundwater Forum held at the Environmental Center in Santa Rosa. This meeting, held under the aegis of the Redwood Chapter of the Sierra Club, outlined the serious nature of Sonoma County's groundwater crisis. Much of what the four expert speakers had to say that night will help you appreciate the inappropriateness of establishing a casino on the groundwater overdraft land near Rohnert Park.

Again, we urge you to deny any approval, sanction, or authorization of the proposed casino near Rohnert Park. There simply is not enough water to support such a huge undertaking.

If you have any questions or would like more information regarding this matter, I can be reached at the telephone number or email address on the letterhead.

Sincerely,

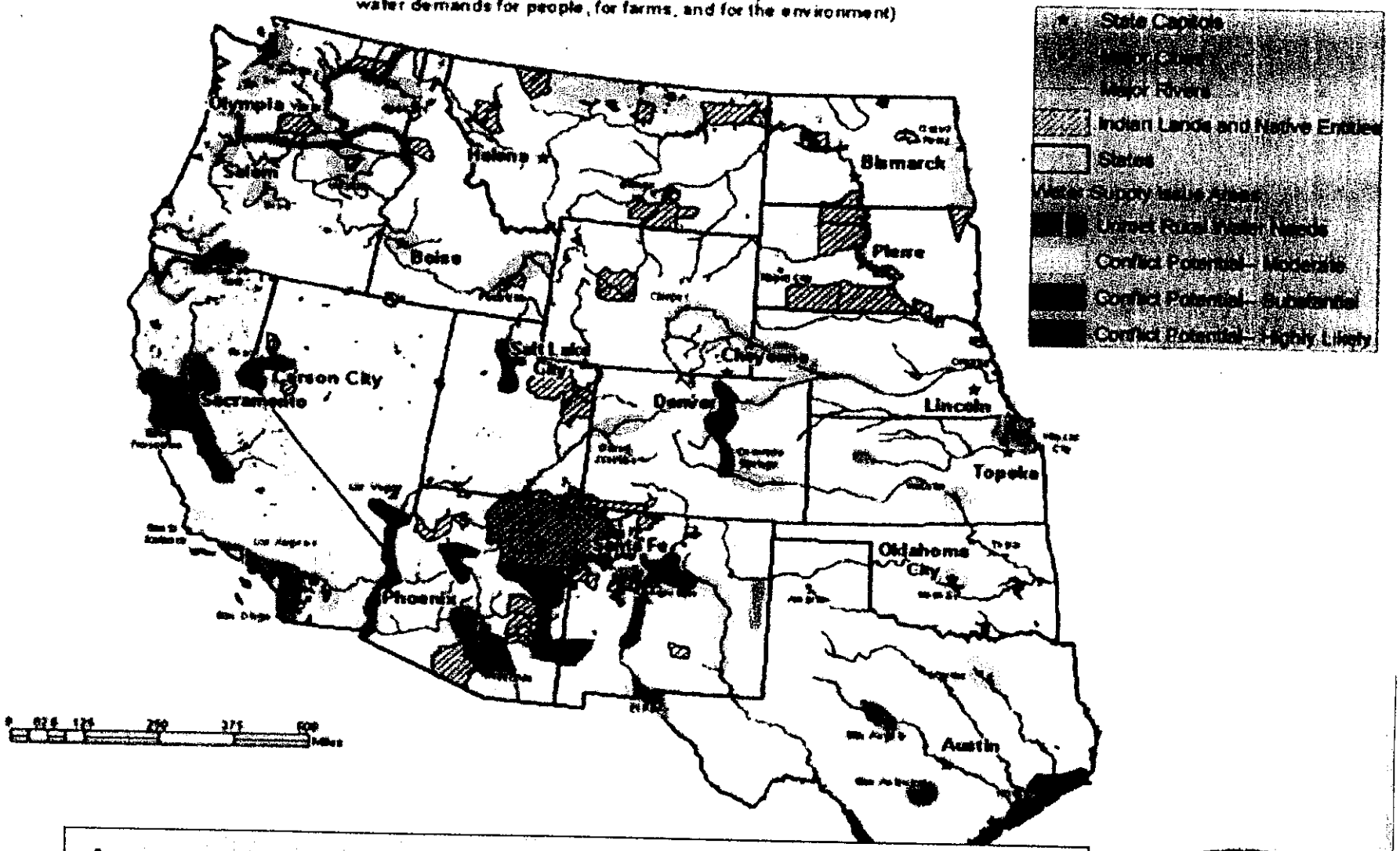
H.R. Downs
President
O.W.L. Foundation

The American West is facing a serious crisis. In the long run, we will not have enough water to meet the fast-growing needs of city residents, farmers, ranchers, Native Americans, and wildlife. The demand is increasing; the supply is not. It is time for Americans to become proactive in our efforts to resolve the problem. Crisis management is not a long-term solution.

- U.S Dept of Interior, 2003

Potential Water Supply Crises by 2025

(Areas where existing supplies are not adequate to meet water demands for people, for farms, and for the environment)



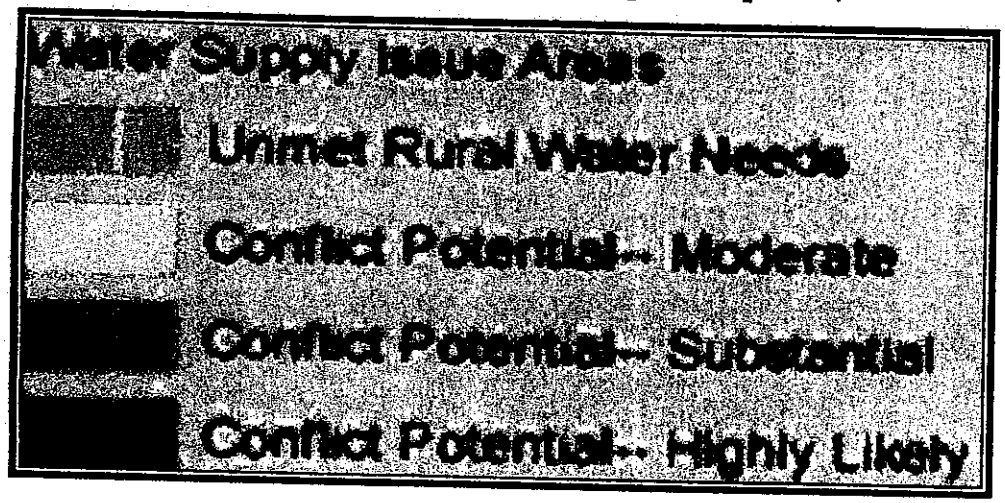
According to the U.S. Dept. of Interior (May 2003), many areas in the west face **"Potential Water Supply Crises by 2025"**

May 2003

Potential Water Supply Crises by 2025

- U.S. Dept. of Interior, May 2003

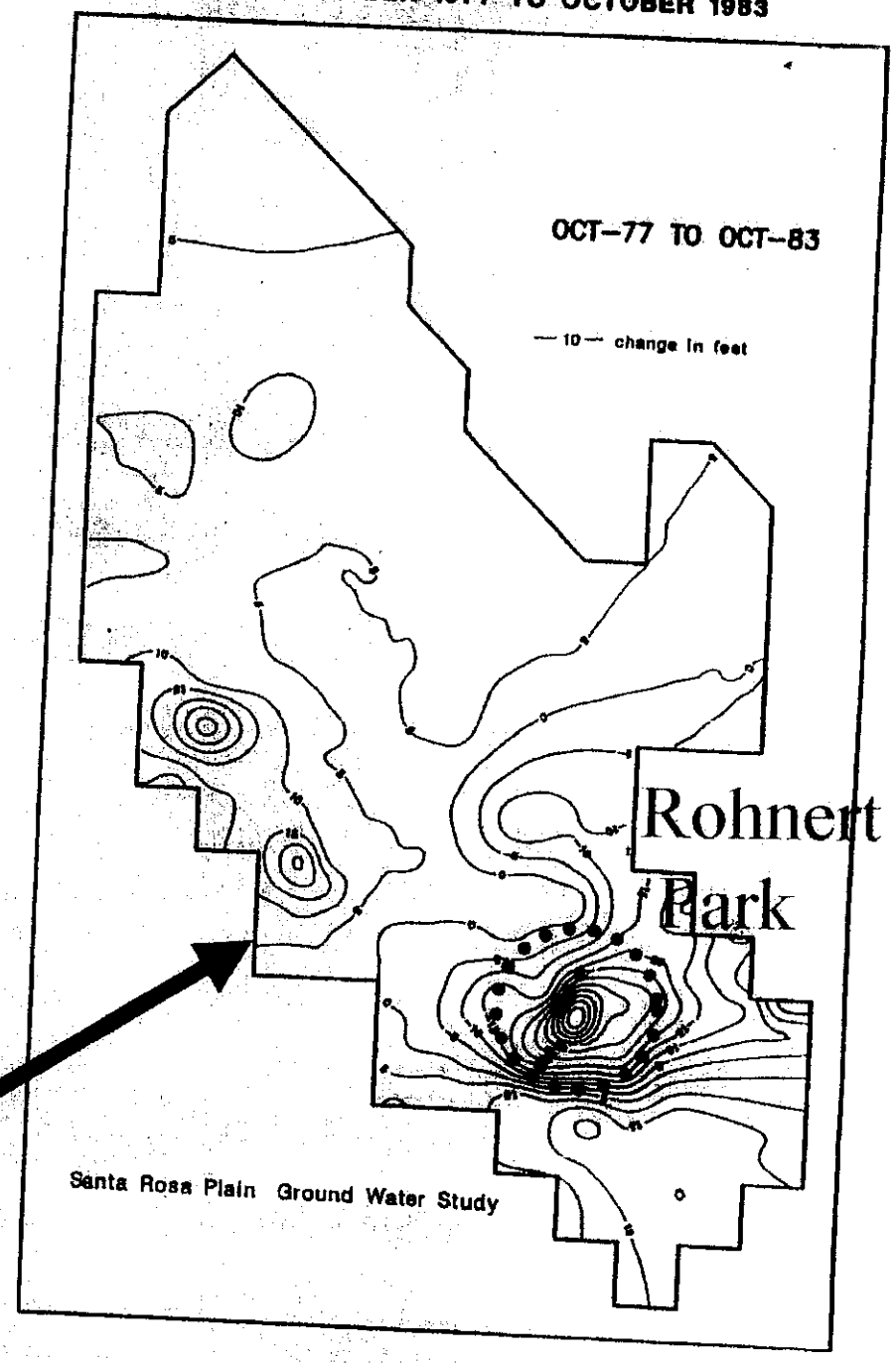
(Areas where existing supplies are not adequate to meet water demands for people, for farms, and for the environment)



Sonoma & Marin's water supply "*Conflict Potential*" compares to L.A. & Klamath Basin.

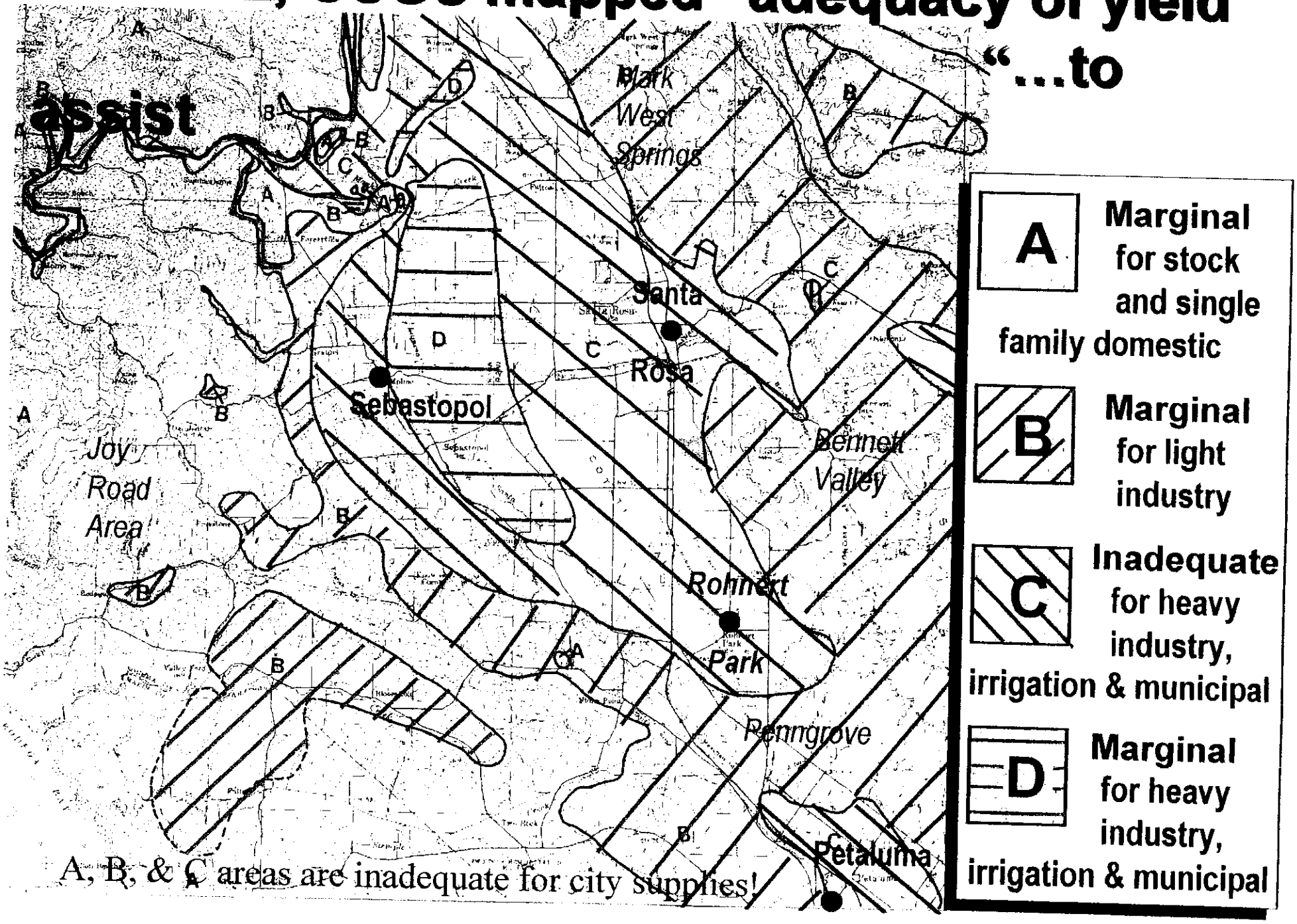
"*Conflict Potential*" in Sonoma & Marin is "*Substantial*"

Back in the 1980s, the California Department of Water Resources (DWR) identified a huge cone of depression centered in Rohnert Park.



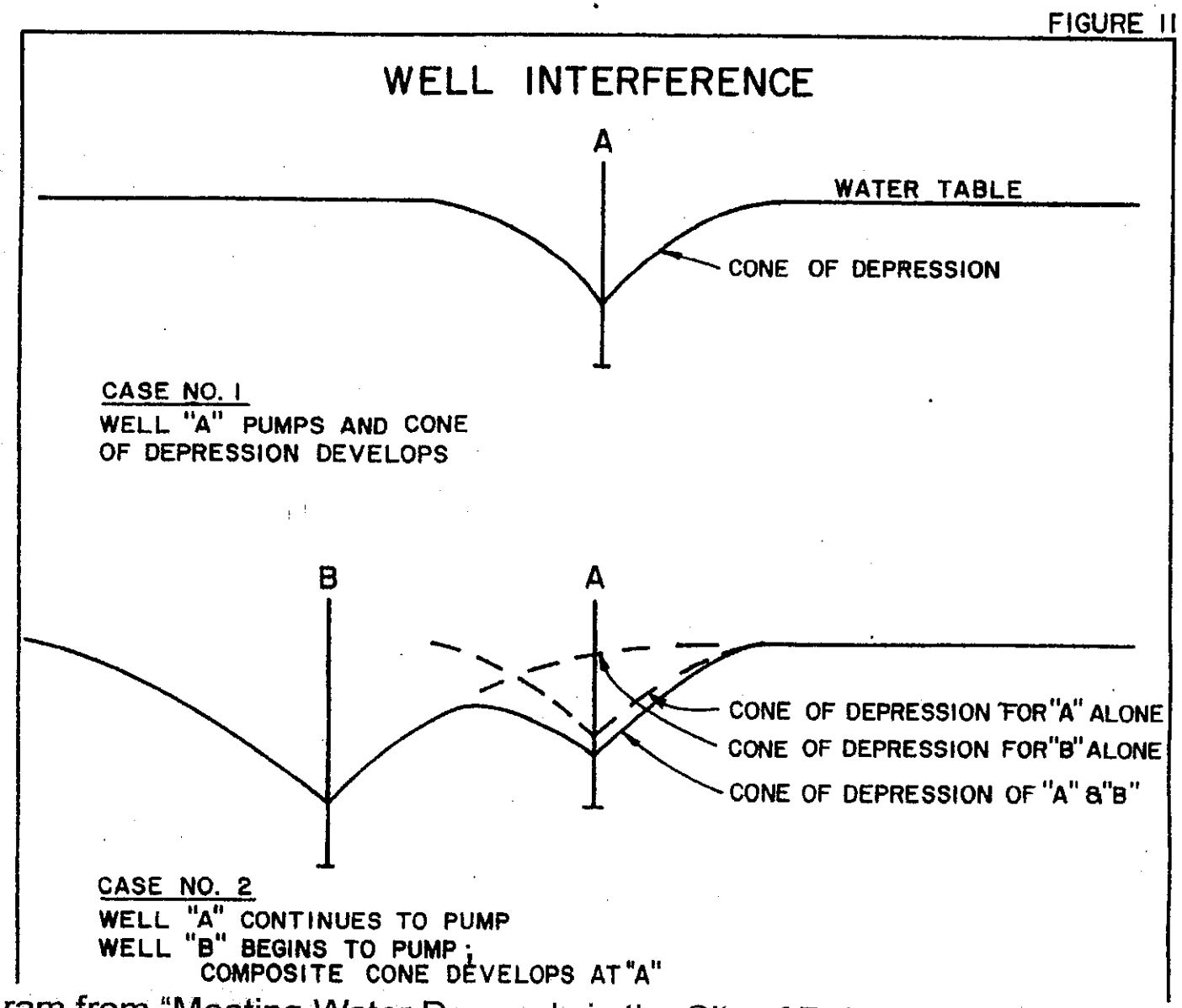
Santa Rosa Plain Ground Water Study (1987)

In 1972, USGS mapped "adequacy of yield" "...to assist



A, B, & C areas are inadequate for city supplies!

"Well Interference" illustrates how "cones of depression" affect water levels in wells.



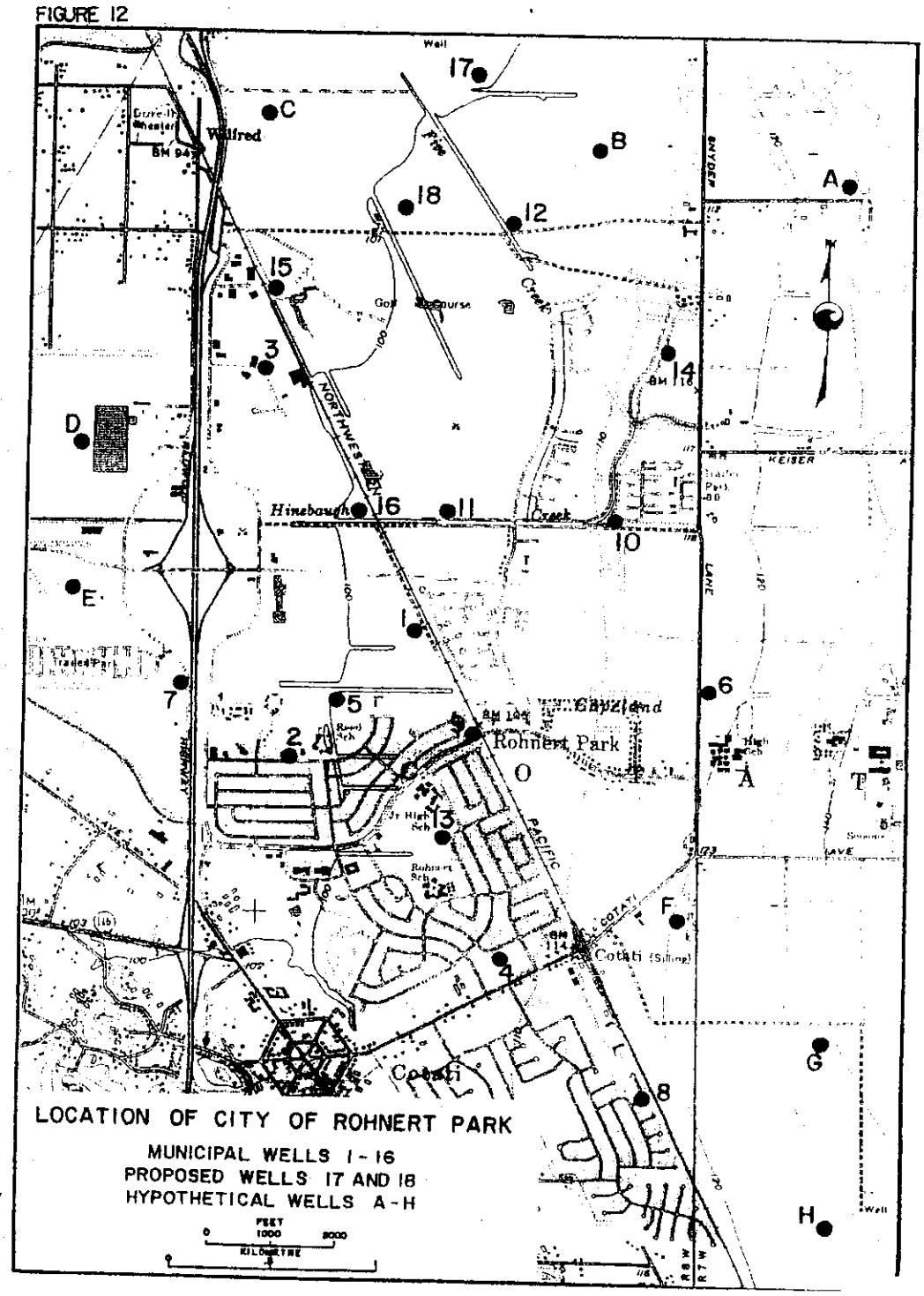
(Diagram from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

In 1979, 16 wells supplied water to Rohnert Park.

Today, Rohnert Park has 42 municipal wells, 31 of which are active.

Rohnert Park is also increasingly reliant on SCWA allocations.

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

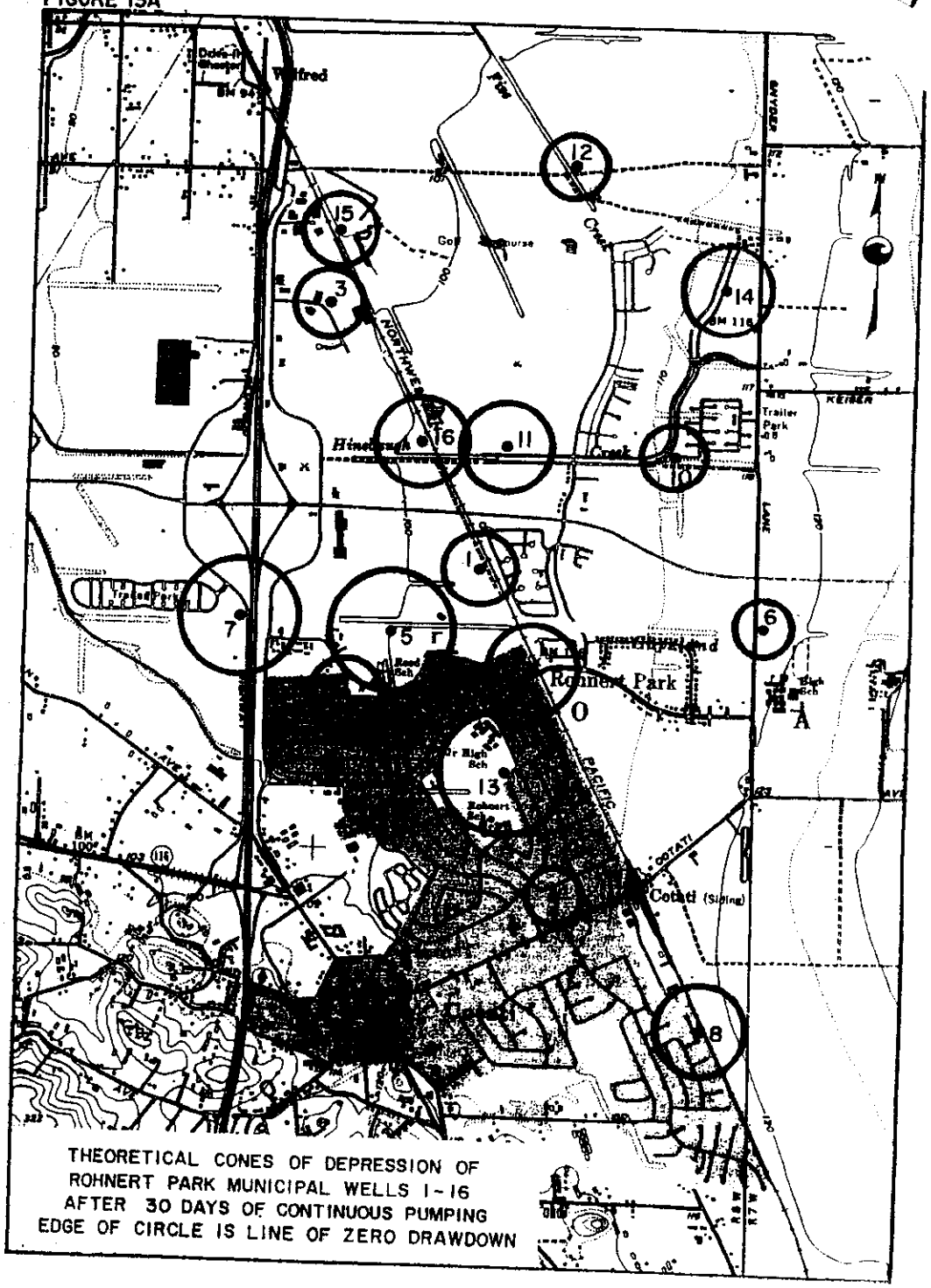


Cones of depression for 16 Rohnert Park municipal wells.

30 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13A

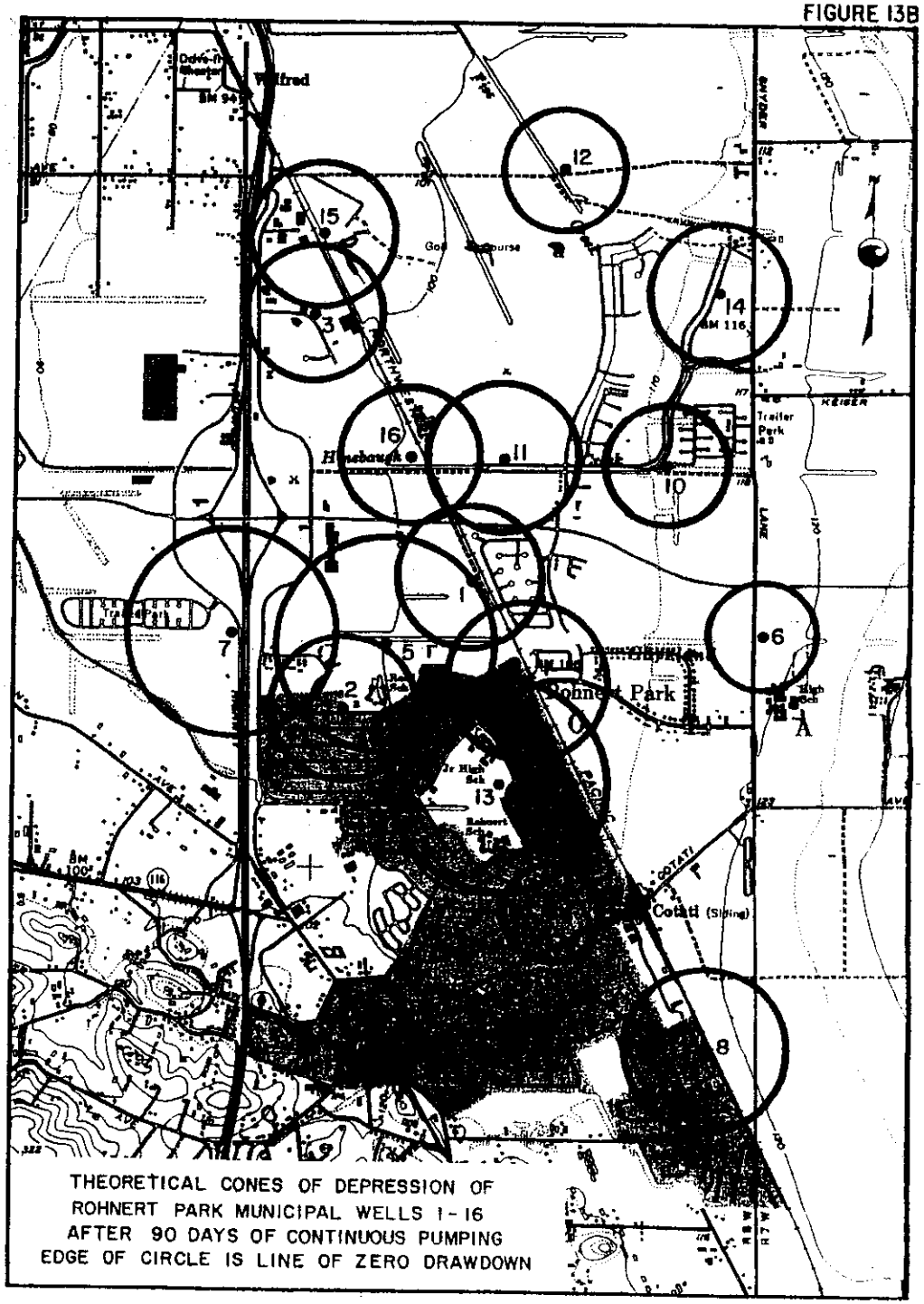


THEORETICAL CONES OF DEPRESSION OF ROHNERT PARK MUNICIPAL WELLS 1-16 AFTER 30 DAYS OF CONTINUOUS PUMPING EDGE OF CIRCLE IS LINE OF ZERO DRAWDOWN

Cones of depression for 16 Rohnert Park municipal wells.

90 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

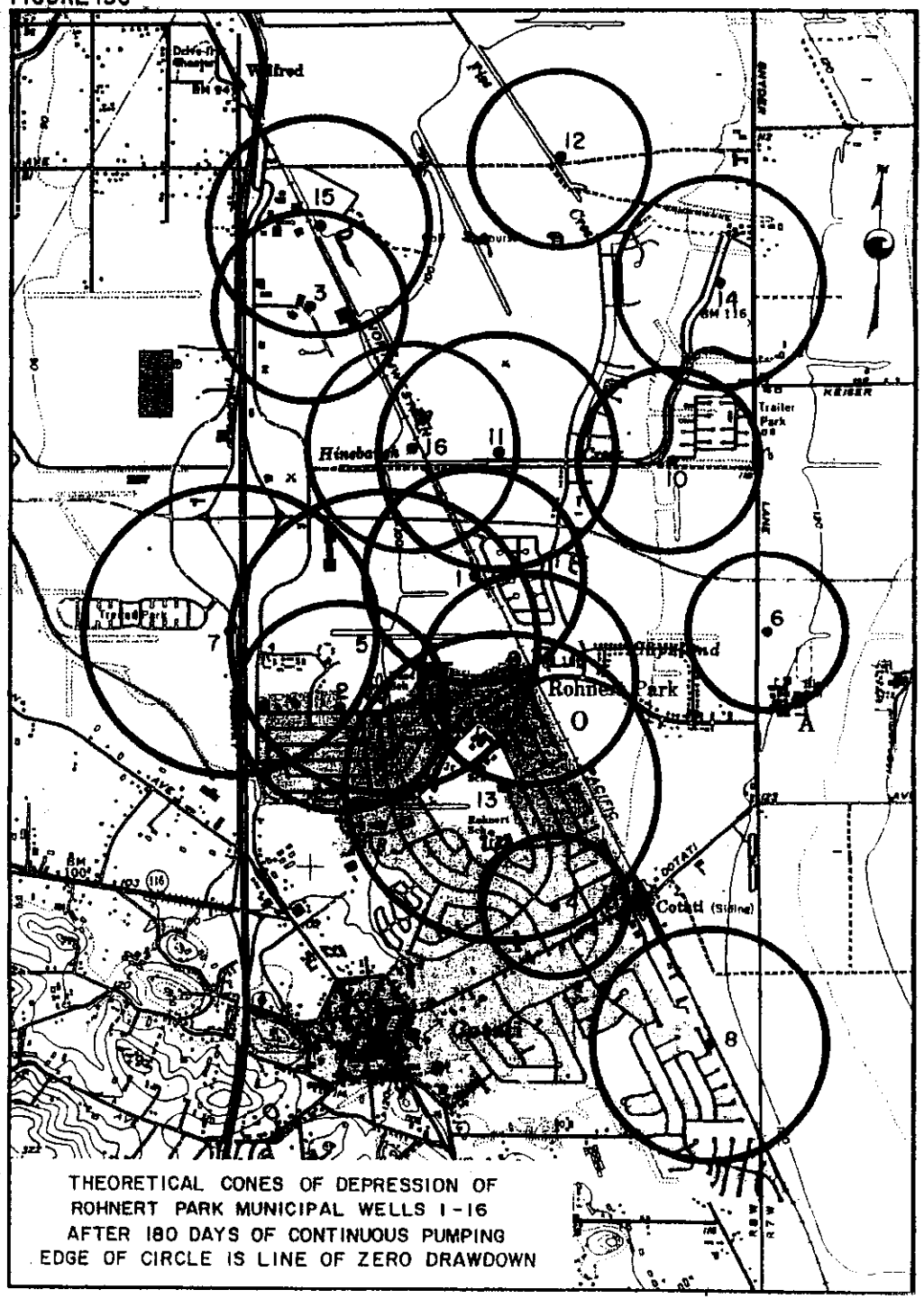


Cones of depression for 16 Rohnert Park municipal wells.

180 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13C

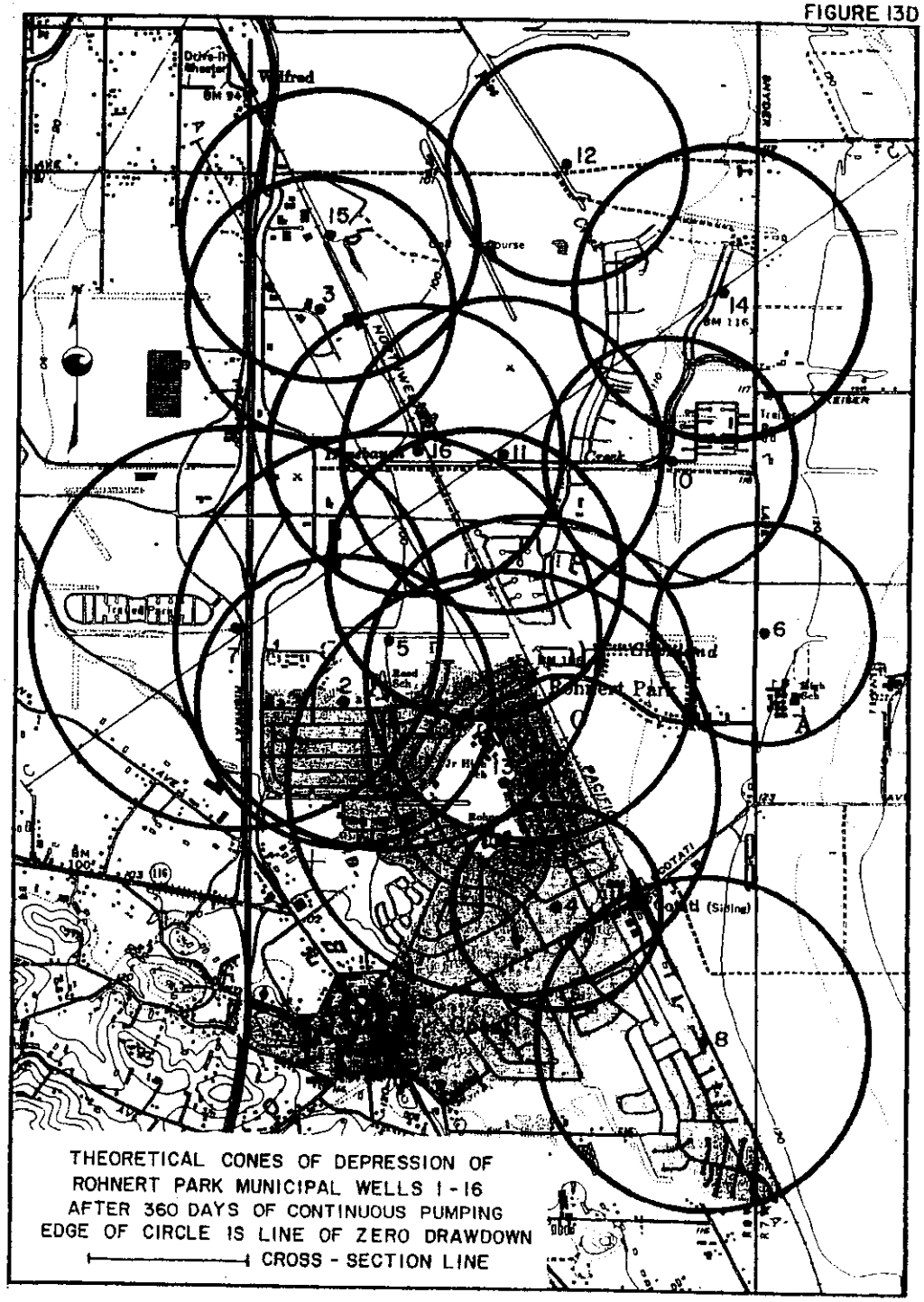


THEORETICAL CONES OF DEPRESSION OF ROHNERT PARK MUNICIPAL WELLS 1-16 AFTER 180 DAYS OF CONTINUOUS PUMPING EDGE OF CIRCLE IS LINE OF ZERO DRAWDOWN

Cones of depression for 16 Rohnert Park municipal wells.

360 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

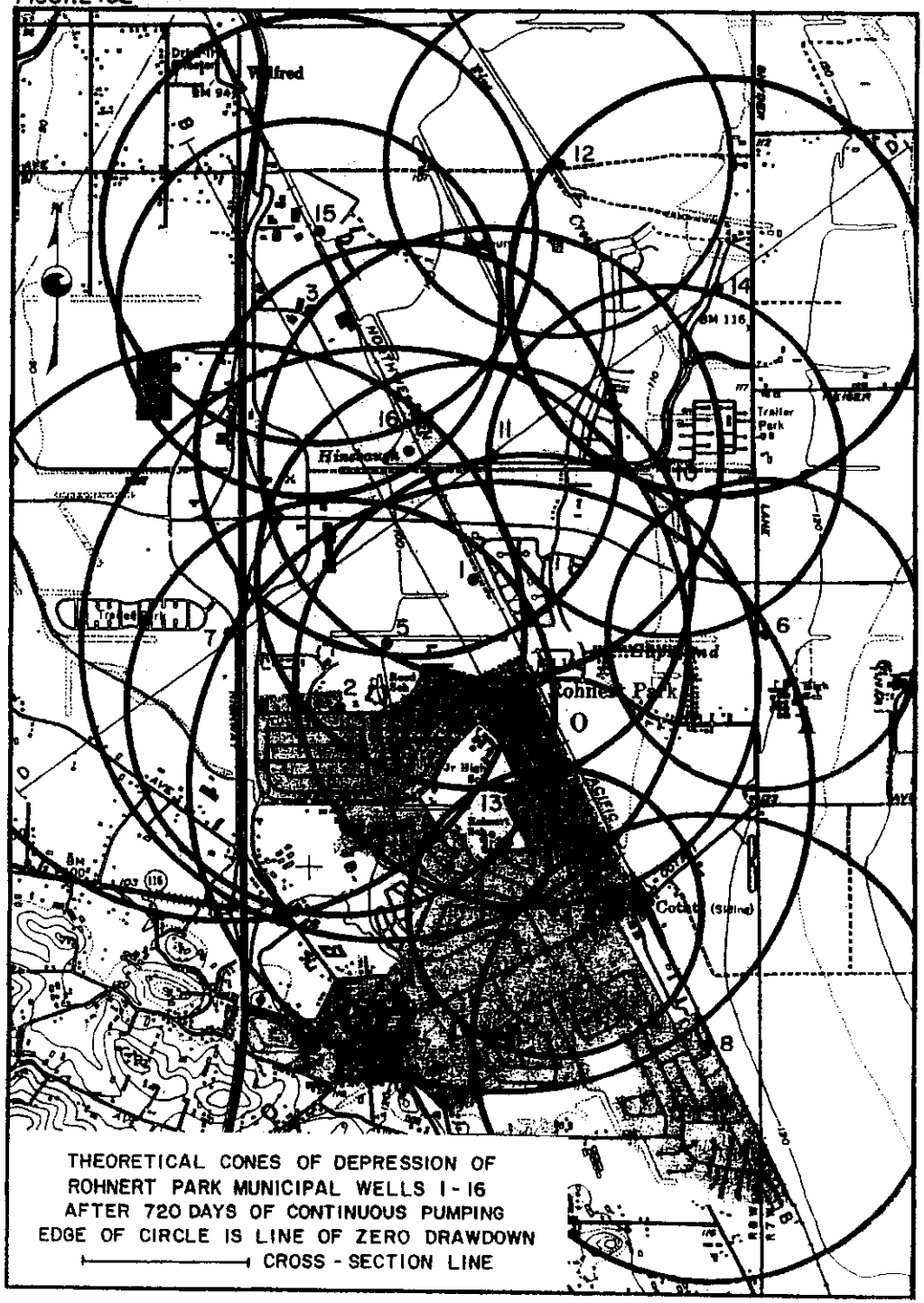


Cones of depression for 16 Rohnert Park municipal wells.

720 Days

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13E



What is the impact of

42 Wells
9000 Days
since 1958

?

(Map from "Meeting Water Demands in the City of Rohnert Park", DWR, 1979)

FIGURE 13E

CALIFORNIA INDIAN LEGAL SERVICES

Oakland Office

510 16th Street, Fourth Floor, Oakland, CA 94612 ✦ Phone: 510/835-0284 ✦ Fax: 510/835-8045
www.calindian.org ✦ calindian@calindian.org

BISHOP
EUREKA
ESCONDIDO

John A. Maier, Senior Staff Attorney
(510) 835-0284, Ext. 303
johnm@calindian.org

OAKLAND
SANTA ROSA
WASHINGTON, D.C.

December 4, 2003

Fred & Maria Bush
5265 Gilchrist Road
Sebastopol, CA 95472

Dear Fred and Maria Bush:

I am writing in response to your letter dated October 11, 2003, which discusses your concern that the resort casino being proposed by the Federated Indians of Graton Rancheria near Rohnert Park will dry up your well. I am forwarding your letter to the consultants who have been hired by the National Indian Gaming Agency to analyze the impacts of the proposed casino by preparing an environmental impact statement under the National Environmental Policy Act (NEPA). The environmental review process is expected to take several years and will provide ample opportunity for public comment. The concerns expressed in your letter will be treated as a public comment with respect to the initial scoping process.

While I understand your frustration with the move from Sears Point to Rohnert Park, I think it is unfair of you to claim that the Tribe has thumbed its nose at every one else. From the beginning, the Tribe has taken extraordinary steps to work with the County and local communities to address their concerns as they exercise their right to replace the reservation that was illegally taken from them forty years ago. The Tribe has every intention to continue to work with the community so that the project benefits not only the Tribe's members, but also the people of Sonoma County.

Sincerely,
CALIFORNIA INDIAN LEGAL SERVICES

John A. Maier
Senior Staff Atttorney

JM:ls

October 11, 2003

RECEIVED

OCT 14 2003

CALIFORNIA INDIAN
LEGAL SERVICES

California Indian Legal Services
510-16th Street, Fourth Floor
Oakland, CA. 94612

Dear Sirs:

We are writing in regards to the Graton Rancheria Indians proposed Casino to be built on the out skirts of Rohnert Park. Ca. We live on the hill west of the proposed site. Our concern is the fact that we have little water now and if your start draining the water from deep wells, we will go dry in a short period of time. Feel if you plan to put in such deep water wells we should be promised that you will furnish water to the people that have been affected from you doing such a thing. It will leave our land with no value at all if we do not have water. Also we would not be able to live here either if the water is gone.

We would also like to know how you are going to handle all the traffic on roads such as ours. It bothers us that you do not seem to care once you get in an area and the land in your name you do as you please. I do not understand how they managed to talk you out of the land at Sears Point. It is out away from people and you would have traffic from all areas going near the Casino and think it would be a much better area than what you have here.

We voted in favor of the Casino's, but thought you would build on the land that you have and not be able to go and take over any land that you desire and thumb your nose at every one else. I am so sorry that you do not respect us as we did in helping you do this to us.

Sincerely,

Fred & Marla Bush

5265 Gilchrist Rd.
Sebastopol, Ca. 95472

743

RECEIVED

MAR 10 2004

National Indian Gaming Commission
Region II, Sacramento, CA

March 10, 2004

From: Chip Worthington Stop the Casino 101.com collation

Dear Sirs:

I am presenting over 7,000 signatures to you. These represent significant community opposition to the proposed Rohnert Park Casino by the Federated Indians of the Graton Rancheria.

Sincerely Yours,

Chip Worthington

Petition to Oppose Casino Development

Date: _____

WE THE UNDERSIGNED strongly oppose the conversion of sensitive wetlands fronting the laguna, on the proximity of Stoney Point Road and Rohnert Park Expressway, for the purpose of a commercial casino development by the Federated Indians of Graton Rancheria. The development of the casino will negative impact the people and communities of Sonoma County.

Name (Print)	Address	Phone	Email	Vol
Wendy Cook	1130 Tapadera Drive Santa Rosa		wcook15008@aol.com	Y (N)
Deborah Cutting	1252 B St. Petaluma CA 94952			Y N
Hardy Jones	1252 B St Petaluma, CA 94952			Y N
Anne Graham	8731 Fehler Ln, Cotati, CA 94931			Y N
Sally A. Schultz	6080 Ensa Ave, Rohnert Park			Y N
Katie Collavin	539 Lamona Ct Rohnert Park	7074795664		Y (N)
Sarah Sharrow	509 7th street Petaluma	707-765-6307		Y N
Tony Terrani	539 Lamont ct R.P.	795-4546		Y N
Pegge Connelly	5420 Hessel Ave Sebastopol	707 829-8133		Y N
Jeff Gomer	4945 Turner Sebastopol	823-1514	jggomc@aol.com	Y (N)

Return completed petitions to:
Law Offices of Maurice Frederick's
6950 Commerce Blvd, Rohnert Park , CA

Message Center (Temp): (707) [redacted]

Do you want to volunteer?
Circle Y=Yes or N=No

Chip Worthington (letter #743)

This submission also included a petition with 7,000 signatures.

744

Nagle, Christine L

From: Chad Broussard [cbroussard@analyticalcorp.com]
Sent: Wednesday, March 31, 2004 2:39 PM
To: Christine_Nagle@nigc.gov
Subject: Fw: Casino

Christine,

Below is a scoping comment on the EIS that was emailed recently to the Tribe. We have printed it out and will be adding the issues to the results of scoping.

Chad

----- Original Message -----
From: Nielson, Scott
To: 'Chad Broussard'
Sent: Tuesday, March 16, 2004 2:27 PM
Subject: FW: Casino

Chad, is there some response we can provide to Ms. Wohlschlaeger indicating that all of these issues will be taken into consideration in the environmental review of the proposed site? Thanks. Scott

-----Original Message-----
From: gloriawohl@netzero.com [mailto:gloriawohl@netzero.com]
Sent: Tuesday, March 16, 2004 12:27 PM
To: coastmiwok@aol.com
Cc: gloriawohl@netzero.com
Subject: Casino

GLORIA WOHLSCHLAEGER

809 SPRING STREET

SAUSALITO, CA 94965

4153324494

Email - gloriawohl@netzero.com

March 16, 2004

Re: Casino at Stony Point Road and Rohnert Park Expressway

I grew up in this neighborhood and my son is now bringing up his family in the same home in this neighborhood.

We went to the County of Sonoma and the City of Rohnert Park in the year of 2000 when we were making a decision about our property to inquire about zoning. We were told emphatically that this area is all zoned as greenbelt in the general plan and is meant to be a separation between the development of Santa Rosa and Rohnert Park.

There are a few issues which frighten me.

One is the depletion of groundwater. There are several homes in the area, many of which have been inhabited by the same people for a long time. They are all served by their own wells and I don't know what they would do if a well was to be drilled to serve the casino and hotel's needs.

The exact area where this development would occur floods during heavy rains. We observed that just recently in this past winter.

The traffic on the narrow rural roads serves the country homes, but probably would not be safe with a large number of vehicles added on a daily basis.

Yours truly,
Gloria Wohlschlaeger

The best thing to hit the Internet in years - NetZero HiSpeed! Surf the Web up to FIVE TIMES FASTER! Only $14.95/ month -visit www.netzero.com to sign up today!

745

CITY OF
SANTA ROSA

BRIEN J. FARRELL
BRUCE LEAVITT
MATTHEW J. LeBLANC
PATRICK C. WILSON
SUZANNE C. RAWLINGS
MICHAEL J. CASEY
CAROLINE L. FOWLER
ELISABETH R. GUNTHER

OFFICE OF THE CITY ATTORNEY
100 Santa Rosa Avenue
Post Office Box 1678
Santa Rosa, CA 95402-1678
707-543-3040
Fax: 707-543-3055

April 1, 2004

Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L. Street, N.W., 9th Floor
Washington, DC 20005

RECEIVED
NATIONAL INDIAN
GAMING COMMISSION
2004 APR -5 PM 5:40

Re: Federation Indian of Graton Rancheria Casino and Hotel Project, Sonoma County California

Dear Ms. Nagle:

Our scoping comments dated March 31, 2004, did not include a written summary of the oral comments regarding housing that we provided you at the March 11 scoping meeting. To assist you in the scoping process, we are providing the following written comments summarizing the oral comments previously provided.

Housing

A casino operation as described will employ many lower wage service workers who will need to obtain housing in the vicinity. This is likely to increase the demand for affordable housing at the low and very low income levels. Typically that housing can only be produced with some degree of public participation. The Draft EIS should describe and quantify the wage levels of the jobs being introduced, the anticipated number of jobs and the number of housing units necessary to meet this demand. Similar analysis should be completed for assumed full development of the property.

Once again, we appreciate the opportunity to provide these scoping comments and your consideration of these issues in the Draft EIS.

Very truly yours,

Elisabeth Gunther
Assistant City Attorney
City of Santa Rosa
ERG:tsg

SONOMA COUNTY CONSERVATION ACTION

540 Pacific Avenue, Santa Rosa, CA 95404
scca@ConservationAction.org
Phone: (707) 571-8566 • FAX: (707) 571-1678
www.ConservationAction.org

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Andrew Goodman
John Alexander

Phone Organizers
Diane Schulz

March 31, 2004

Ms. Christine Nagle, NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, DC 20005

RECEIVED
NATIONAL INDIAN
GAMING COMMISSION
2004 APR -5 PM 4: 29

RE: DEIS Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

Below we have identified areas of concern that we feel must be included in the EIS for the Graton Rancheria Casino Project. All areas of concern should be evaluated for direct and indirect impacts. All areas of concern should be evaluated for short-term and long-term effects. Cumulative impacts on all areas of concern should be addressed in the document as well.

1. This development will not only impact Rohnert Park, but will also have great impacts on Rohnert Park's neighboring cities. Therefore, the cities of Sebastopol, Petaluma, Cotati, and Santa Rosa, as well as the county of Sonoma should all be named as "cooperating agencies" in the preparation of the Environmental Impact Statement.
2. Once this land is placed into trust, the Federated Indians of the Graton Rancheria, will not be subject to any further environmental review regarding future development on the site. Therefore, the EIS should be conducted as if development will occur on all lands on the site that are not identified as lands to be placed in permanent protection. The NIGC should assume that the development on these lands would be of the same scope and nature as the development on the areas that are already identified to be developed. Only lands that are to be put into open space protection in perpetuity and that involve waivers of the tribe,s sovereign immunity, so that the protection is legally enforceable, should be treated as lands that will not eventually be developed.
3. The current proposed location is on lands designated as a community separator in the county's general plan and is outside Rohnert Park's voter-approved Urban Growth Boundary. What are the impacts to local land use planning tools if this development is allowed to go forward?
4. The EIS should identify sources of funding that will be in place to achieve the mitigation measures and to operate them over the long term. There needs to be independent verification that funding for mitigation measures will be available at the outset and will be fiscally sustainable to operate those mitigations over the long term. Independent verification should include an independent audit of the tribe's and/or casino's books if funding for mitigation is dependent on a percentage of

revenues.

5. The EIS should identify what provisions or enforceable guarantees will be made to ensure mitigation effectiveness, in both the short and long terms.

6. What will be the "urban Heat Island" affect of this development?

7. What will be the night light pollution effects of the development?

8. After the site is taken into trust, the lands will be lands of a sovereign nation. What environmental protection laws will the tribe put into place to protect the surrounding community from any off-reservation impacts of activities that occur on the site? What will be the recourse for residents of the surrounding community to seek enforcement of those laws? Please identify the courts having jurisdiction over on-site activities and compliance with permits associated with the development. Where are the decisions of this court appealed? Are any of the provisions for citizen action available under many environmental laws available under the court system to be used?

9. All alternative sites reviewed by the tribe prior to selecting the proposed site should be evaluated as options in the EIS.

10. The tribe has indicated that they plan to dig their own wells on the property to supply water to the development. A water budget, that identifies both the income (e.g., groundwater recharge) and expenses (e.g., the amount to be drawn out of the aquifer by the wells the tribe uses) needs to be developed as part of the EIS process to prevent overdrafting of the aquifer and eventual hydrological bankruptcy. What are the plans to monitor this water budget on an ongoing basis? What are the provisions for enforcement of any groundwater management program?

11. What will be the affects of the polluted stormwater run-off on the groundwater in the area and on the waters that flow from the Laguna de Santa Rosa into the Russian River (a major source of drinking water for county residents)?

12. What will be the qualitative and quantitative affects to the surrounding municipalities and landowners who rely on groundwater if the tribe overdrafts the shared aquifer?

13. The tribe has indicated that they plan to operate their own wastewater treatment plant on site. What will be the affect of the discharges from this plant to the Laguna de Santa Rosa? Will those flows contribute to the degradation of water quality for Sonoma County Water Agency's intakes (located downstream)? If the wastewater from the treatment plant is used to recharge the aquifer, what will be the qualitative and quantitative effects of this water in the aquifer (i.e., how will it affect municipal and private drinking water supplies)?

14. What will be the flooding effects, on the site and on the surrounding properties, caused by the paved over areas of the development?

15. If the tribe plans to capture water on site (e.g., wastewater, rainwater,etc.) in order to recharge the aquifer, how will these be designed to prevent them from becoming mosquito-breeding habitats?

16. The Tribe has indicated that they may explore and evaluate options with the Sonoma County Water Agency (SCWA) to identify a supply of water other than from new wells. If they choose to contract with SCWA to provide water, what will be the qualitative and quantitative affects on the supply of water available to current SCWA customers?

7. What will be the impacts of the fertilizers and pesticides used to maintain the landscaping on the site?

8. What will be the impacts on air quality as a result of the increased traffic loads that will result from the development? How will these impacts affect people with breathing problems (e.g., asthma) in the area? What will be the impacts of the increased traffic load with regards to increased ozone and smog?

9. The proposed location is within the range of the federally listed California Tiger Salamander (CTS) and other federally and state listed species. A complete census/survey of the CTS and other federally or state listed species on the site should be completed as part of the EIS process. The EIS should include discussions of associated Recovery Plans and Habitat Conservation Plans for the listed species and how this development will impact those Plans.

20. What will be the effects of the polluted stormwater run-off on the CTS population on surrounding properties and in the Laguna de Santa Rosa? What will the effect of the polluted run-off from the site be on other flora and fauna on the site, on surrounding properties, and in the Laguna de Santa Rosa? The Laguna de Santa Rosa includes critical wetland habitat for several federal and state listed endangered species. What will be the effects of the polluted run-off on these species?
21. There is no current capacity available on State Highway 101. The 3rd lane that is being built is to address currently existing capacity needs. What will be the effect on traffic on Highway 101 if the casino and the associated development go forward at the proposed site? How will this project and future related development on the site provide for new road capacity to deal with the project's traffic impacts?
22. The EIS should identify transportation alternatives to reduce auto dependency and traffic impacts.
23. What will the traffic impacts of this development be on the surrounding communities? Special attention needs to be placed on the traffic impacts on the feeder roads to the site.
24. What impacts will the increased traffic loads associated with the development have on traffic accidents in the surrounding area?
25. How will the disposal of solid waste generated at the site affect the county landfill's capacity to serve its existing customers?
26. What will be the housing demand created by this development, and what will be the provisions for providing this housing? What are the provisions to supply the affordable housing demands created by this development?
27. What are the viewshed impacts of this development?
28. What will be the affects of the development with regards to protecting and respecting the adjacent agricultural uses?
29. This complex is outside of all local and county General Plan growth projections. None of these General Plans provides infrastructure for this project. How will the local and county General Plans be modified to include this complex?
30. This project requires public infrastructure improvements outside of the jurisdiction of the Federated Indians of the Graton Rancheria and the jurisdiction of the National Indian Gaming Commission. Therefore, the project description and the EIS must include all impacts and improvements throughout the surrounding communities as part of the project description.
31. Any off-site mitigations, improvements, or requirements must also undergo a CEQA process with the local jurisdictions. How will legal approval of these studies be coordinated with the EIS process for the project?
32. Will this project require a 404 Wetlands permit under the Clean Water Act?
33. Will full compliance with the Endangered Species Act be required?

Thank you for the opportunity to submit comments.

Sincerely,

Jim Duffy
Executive Director

747

METROPOLITAN
TRANSPORTATION
COMMISSION

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Sonoma County and Cities

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Cities of Alameda County

Steve Heminger
Executive Director

Ann Flemer
Deputy Director/Operations

Therese W. McMillan
Deputy Director/Policy

March 23, 2004

Ms. Christine Nagle
NEPA Coordinator
National Indian Gaming Commission
1441 L Street, NW, 9th Floor
Washington, D.C. 20005

RE: DIES Scoping Comments, Graton Rancheria Casino Project

Dear Ms. Nagle:

The Metropolitan Transportation Commission (MTC) appreciates the opportunity to comment on the scope of the EIS for the Graton Rancheria Casino and Hotel Project. We request the analysis of transportation related impacts address the following:

1. The estimated increase in travel due to the project in year 2030 (the horizon year for the region's long range transportation plan *Transportation 2030*) including trips by patrons and employees and trips originating both within and beyond the nine-county Bay Area.
2. The cumulative impacts of projected increase in travel on existing and planned transportation infrastructure in the Highway 101 corridor including mainline highway operations, major interchanges, major local arterial roadways, transit services, and bike and pedestrian travel in year 2030. With respect to this point, we request the following:
    - The recently updated Sonoma County traffic model be used for analysis of future transportation conditions.
    - The analysis incorporate assumptions on future transportation infrastructure, planned development, and county and regional travel patterns in the most recent Sonoma County General plan and Regional Transportation Plan (*Transportation 2030*). Please examine the transportation impacts both with and without the planned Sonoma Marin Area Transit (SMART) commuter rail, which is included in the regional transit expansion plan but is currently not fully funded for operation.
3. Identify transportation improvements needed to serve project employees and patrons and address the associate impacts by minimizing traffic delays, maintaining adequate service levels and ensuring safety for bicyclists and pedestrians as well as motorists. Please identify how transit access will be provided through public and/or private operators.

4. Estimate the cost of any needed improvements to mitigate the project's traffic impacts, including an estimate of any incremental transit and paratransit operating cost increases; the EIS should also identify potential sources of funding to implement these improvements .
5. Evaluate motor vehicle emissions associated with increased traffic and compare to thresholds established by the Bay Area Air Quality Management District.

If you have any questions regarding these comments, please contact Lisa Klein of my staff at 510.464.7832.

Sincerely,

Doug Kimsey
Planning Manager

DK:lk

J:\SECTION\PLANNING\Klein\Coordination\Environmental Documents\Graton NOI.doc

``DEIS Scoping Comments, Graton Rancheria Casino Project"

TO: **Christine Nagle, NEPA Coordinator**
National Indian Gaming Commission
1441 L Street, NW., 9th Floor
Washington, DC 20005
Telephone (202) 632-7003

Peggy Soares

FROM: **Peggy Soares**
4319 Primrose Avenue
Santa Rosa, CA 95407

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2004 APR 30 PM 4:27

This proposed property is in direct violation with the Sonoma County General Plan. This property is designated as the community separator.

How are you going to address the substantial growth in an area that has been designated to be land for agricultural, community separator and undeveloped?

Houses on Wilfred Avenue will be eliminated to widen Wilfred Avenue and make access to the proposed casino site.

How are you going to address the loss of these homes ?

Statistics indicate that within a 10-mile radius of a casino property values drop 10%. With the proposed casino site drilling 2 wells 1,000 feet deep our wells will go dry, there will be excessive noise, air pollution, additional traffic on narrow country roads, neon lights 24 hours a day 7 days a week, failing septics due to flooding, increased crime and the loss of rural quiet life.

How are you going to address the lost of property values, failing septics, dry wells, excessive noise?

I think Skaggs Island is a better location, it is not in a residence area, not in the 100 year flood plan, not on a county separator, people would not loss their homes due to wells going dry and becoming contaminated, septics won't be failing and property values dropping. There is more than enough land for the casino plus an addition 3,000 areas to be used for something else. There is already water and sewer available at Skaggs Island and the site is more generally located between Marin and Sonoma County, allowing for a lot more traffic to the casino.

Paul D. Stutrud
P. O. Box 2205
Rohnert Park CA 94927-2205

13 April 2004

Federated Indians of Graton Rancheia
P. O. Box 481
Novato CA 94948

Dear folks:

I have been sympathetic to your plight from the day the white man first landed in this country. I have friends who are or were (now deceased) active in the tribal affairs of their own particular tribes. Whether they were of this area or from Wyoming, New Mexico or Minnesota.

I have modeled my personal life to an extent after the mores of the native Americans. And now it seems that we may have a clashing of ideals. I am an environmentalist. I believe in the maximum preservation of the lands and minimal damage to the natural structure. This is also part of my heritage as a person of Scandinavian descent (Norwegian).

For more than thirty years I have worked on General Plans (the required document of every city and every county in this state). I have gone so far as to file a lawsuit against the City of Novato in regards to their non-complying General Plan (Stutrud v City of Novato). I am not a wealthy person but I could not stand by and let the City of Novato continue in their pro-growth at any cost schemes to pave over the lands of Novato.

I was also involved in the Bahia issue in Marin County in which Condiotti Enterprises planned to build a lot of houses on very sensitive marsh and natural areas. When Harvey Bell and the Sierra Club filed a lawsuit against the City of Rohnert Park in 1990 for similar complaints that I had against the City of Novato, I helped on that lawsuit. (I am not an attorney).

In 1992 I filed a complaint with the Sonoma County Grand Jury about the questionably legal approvals and negotiations the City of Rohnert Park had with Jimmie Rogers and his gang of "old boys – developers". The report came out in January 1993 and I believe because of that report and also the fact that I also filed a complaint with the FBI that Jimmie Rogers had to curtail his "development" plots and schemes.

I filed three more complaints with the Sonoma County Grand jury and each was investigated and a report was written on even more things not done legally or at the least that were questionable by the city of Rohnert Park.

In 1997, I answered a lawsuit filed by the City of Rohnert Park against its own citizens in the city's attempt to impose a "fire" tax to raise more money for the Department of Public Safety. Although I lost in the trial court I won in the Appellate Court in San Francisco. The City of Rohnert Park had attempted to bypass the required 2/3 majority vote imposed by the 1996 Proposition 218, which was a state constitutional amendment to Article XIII (c) and (d).

The City of Rohnert Park had to return the prematurely obtained taxes that were collected to the citizens.

I do not know exactly how the Graton Indian Rancheria people chose the site on Highway 37 and I do not know how they chose the site on Stony Point Road. Both are extremely environmentally sensitive pieces of property. The Highway 37 site is essentially 90 feet of bay mud (the geological term) and would require extreme amounts of pile driving to hard pan (90 feet) in order to attempt to create a substantial foundation. There is no readily available water and there is no environmentally sensitive way to provide for sewage disposal. The site would require extreme amounts of highway construction, including new bridges across the Petaluma River.

There is much more I could recite on the Highway 37 site.

In regards to the site on Stony Point Road, it has at least five federally liste endangered species. It has vernal pools which are protected by the state of California. There is a flood control canal that runs across the property and regularly overflows its banks and floods the surrounding land (your proposed site). Flooding also occurs regularly across the Rohnert Park Expressway in the area between the bridge west of the Rancho Verde Mobile Home Park and Stony Point Road.

The roads leading to your proposed site (Stony Point Road, Rohnert Park Expressway, Wilfred Avenue and Highway 101) are already impacted with too much traffic and not enough paved surface. Other roads that would also be used are also extremely impacted. Roads such as Adobe Road/Petaluma Hill Road.

In reality, Sonoma County is about 20 years behind in imposing a moratorium on all construction. The groundwater has been over drafted for at least ten years but more like 20 years. The "surface" water, that is, the water from the Russian River and Eel River has also been over drafted in another way. The people of Mendocino County, namely the Friends of the Eel River have won a lawsuit against the Sonoma County Water Agency that puts limits on future draws on the Eel River. The state and federal government are also involved and there are proposals for cut-backs on the draw from the Eel River for between 15% to 80% in order to restore the fishery of the Eel River.

Long before you, the Graton Indians, came with your proposal for a casino, several groups in the county have been battling with the Water Agency and the Board of Supervisors about appropriate responses to the water problem. We are on the verge of a serious problem. Hundreds of wells have gone dry and have had to be redrilled to substantially deeper depths. There are no guarantees on water production at the deeper depths.

The City of Rohnert Park in its General Plan and its EIR state that Rohnert Park draws more than double the amount of water that is recharging the groundwater. Rohnert Park uses more than 4 million gallons a day while the recharge rate is only 1.6 million gallons per day.

I understand that you are proposing up to four wells for your casino/hotel site that will be drilled down 1,000 feet. You will create a desert. You will create a disaster.

Sonoma County does not have the water.

Marin County also does not have the water.

Why don't you build the casino and hotel on land that can support it? How about Treasure Island in San Francisco Bay. How about Alcatraz Island?

In closing, I am an engineer. I have been involved in the General Plan processes for more than 30 years and for all of those years have studied land use planning and planning to preserve the environment. I understand that you are actually fronting for a Las Vegas Casino firm. They may have lots of money to spend but there are some instances where the amount of money has no grounds. Money cannot solve everything.

Yours truly,

Paul D. Stutrud

Paul D. Stutrud

CALIFORNIA INDIAN LEGAL SERVICES

Oakland Office

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John A. Maier, Senior Staff Attorney
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johnm@calindian.org

OAKLAND
SANTA ROSA
WASHINGTON, D.C

April 20, 2004

Paul D. Stutrud
P.O. Box 2205
Rhonert Park, CA 94927-2205

Dear Mr. Stutrud,

I am in receipt of your April 13, 2004 detailing your past work in the community and expressing your concerns with the environmental impacts of the resort casino being proposed by my client, the Federated Indians of Graton Rancheria. As you may know, the National Indian Gaming Commission ("NIGC"), in cooperation with the Bureau of Indian Affairs ("BIA") and the Tribe, issued a Notice of Intent in the Federal Register to prepare an Environmental Impact Statement ("EIS") for the proposed project and conducted a public scoping meeting at the Luther Burbank Center on March 10. Although the public comment period concerning the scoping process concluded on April 1, 2004, I will forward your letter to the NIGC for their consideration. You will have additional opportunities to comment on the project upon issuance of the Draft EIS.

Sincerely,
CALIFORNIA INDIAN LEGAL SERVICES

John A. Maier
Senior Staff Attorney

JM:ls

cc: Christine Nagle, NIGC

CALIFORNIA INDIAN LEGAL SERVICES

Oakland Office

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John A. Maier, Senior Staff Attorney
510/835-0284, Ext. 303
johnm@calindian.org

OAKLAND
SANTA ROSA
WASHINGTON, D.C

April 20, 2004

Sent by Fax and First Class Mail

Christine Nagle
National Indian Gaming Commission
1441 L Street NW, Suite 9100
Washington, DC 20005

Dear Ms. Nagle,

I received the enclosed letter from Paul Stutrud and am forwarding it to you for your consideration. Also enclosed is a copy of my response to Mr. Stutrud.

Sincerely,
CALIFORNIA INDIAN LEGAL SERVICES

John A. Maier

John A. Maier
Senior Staff Attorney

JM:ls

cc: Chad Broussard, AES
(*by fax and first class mail*)