

**From:** [Bob Bruce](#)  
**To:** [Doulou, Vannice C.](#)  
**Subject:** NEPA categorical exemption for management agreements  
**Date:** Tuesday, February 23, 2016 2:55:08 PM

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Dear Ms. Doulou:

I am Bob Bruce, general counsel for Warner Hospitality and Warner Gaming. Our affiliated companies manage tribal gaming facilities for the Mescalero Apache Tribe of New Mexico and the Spokane Tribe of Indians of Washington under NIGC-approved management agreements (and currently have another management agreement before the NIGC for the Fort Mojave Indian Tribe of Nevada and Arizona).

I support your proposed change regarding the application of categorical exclusions to management agreements. I do not view IGRA as requiring NEPA analysis for the review and approval of gaming management agreements. I believe that this categorical exemption would benefit Indian Tribes greatly, in that it would facilitate economic development, and help tribes avoid millions of dollars in expenses and years in delay in development of their gaming projects.

- Thank you, Bob Bruce

**Robert E. Bruce** | Executive Vice President & General Counsel

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