

Attachment A

Notice of Preparation

NOTICE OF PREPARATION OF AN ENVIRONMENTAL ASSESSMENT / TRIBAL ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: Koi Nation of Northern California Shiloh Resort and Casino Project

NEPA LEAD AGENCY: Bureau of Indian Affairs, Department of the Interior

TRIBAL LEAD AGENCY: Koi Nation of Northern California

SCOPING COMMENT PERIOD: Friday, May 27 – Monday, June 27, 2022.

SUMMARY: The Koi Nation of Northern California (Koi Nation) proposes to build a resort and casino on land that it owns in unincorporated Sonoma County, California adjacent to the Town of Windsor (Proposed Project). As part of the Proposed Project, an application has been filed with the Bureau of Indian Affairs (BIA) to take approximately 68.6 acres of land into trust on behalf of the Koi Nation for gaming purposes. The federal actions necessary to implement the Proposed Project trigger the requirements of the National Environmental Policy Act (NEPA). This notice advises the public that the BIA, as NEPA lead agency, intends to gather information necessary for preparing an Environmental Assessment (EA) pursuant to NEPA in connection with the Proposed Project. This notice also announces and opens the public scoping process. Interested parties are invited to submit comments identifying potential environmental issues, concerns, reasonable mitigation measures, and alternatives to be considered in the EA. Additionally, based on the anticipated requirements of a future Tribal-State Compact between the State of California and the Koi Nation, a Tribal Environmental Impact Report (TEIR) will be required to analyze the potential off-reservation environmental impacts of the Proposed Project. To reduce paperwork and eliminate redundancy, the TEIR will be prepared in coordination with the Environmental Assessment EA, resulting in a joint “EA/TEIR” (herein referred to as an “EA”). Thus, this notice is also intended to fulfill the anticipated requirements of the Tribal-State Compact to provide interested parties with information describing the Proposed Project and its

potential significant effects and the opportunity to provide comments related to the scope and alternatives to be addressed within the environmental document. Information is available online at shilohresortenvironmental.com.

DATES: Written comments on the scope of the EA should be sent as soon as possible and no later than Monday, June 27, 2022 (30 days after publication of this notice in The Press Democrat). (An additional comment period for the draft EA will be announced at a later date through the publication of a Notice of Availability.)

ADDRESSES: You may mail or hand-deliver written comments to Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way, Sacramento, CA 95825. Please include your name, return address, and “Koi Nation Shiloh Resort and Casino Project” on the first page of your written comments. You may also submit comments through email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use “Koi Nation Shiloh Resort and Casino Project” as the subject of your email.

FOR FURTHER INFORMATION CONTACT: Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Regional Office, 2800 Cottage Way, Room W–2820, Sacramento, CA 95825; telephone: (916) 978–6165; e-mail: chad.broussard@bia.gov.

Information is also available online at shilohresortenvironmental.com.

SUPPLEMENTARY INFORMATION:

Project Description and Location: The Koi Nation submitted an application to the BIA on September 15, 2021 requesting that the Secretary of the Interior take title to approximately 68.6 acres of fee land (project site) in unincorporated Sonoma County, California, in trust for the Tribe, pursuant to Section 5 of the Indian Reorganization Act, 25 U.S.C. § 5108, and its

implementing regulations (Proposed Action). The project site is located outside of, but contiguous to, the Town of Windsor (**Figure 1** and **Figure 2**), and approximately 12 miles from the Koi Nation's tribal headquarters in Santa Rosa, California. The project site is bordered by Shiloh Road and residential parcels to the north, Old Redwood Highway and residential parcels to the west, and agricultural and commercial parcels in unincorporated Sonoma County to the south and east (**Figure 3**). Existing land uses on the project site consist of a residence and operating vineyard; Pruitt Creek bisects the central portion of the site.

The Proposed Project includes the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site. The riparian areas of Pruitt Creek will be primarily avoided by the proposed development. The portions of the project site outside of the riparian area and building footprint would be landscaped with existing vineyard areas maintained around the perimeter of the site to the extent feasible. Water supply to serve the project is proposed through the use of on-site wells, and wastewater would be treated via a proposed on-site tertiary wastewater treatment plant (WWTP). Recycled water generated by the proposed on-site WWTP would be reused for toilet/urinal flushing, cooling systems, and for irrigation of the vineyards and landscaping; thereby reducing the potable water demands of the Proposed Project. During dry periods, excess recycled water would either be stored on-site in detention basin(s) or could be utilized to irrigate nearby agricultural fields and parks; during the rainy season, the tertiary treated effluent would be discharged to Pruitt Creek in accordance with a National Pollutant Discharge Elimination System (NPDES) permit from the U.S.

Environmental Protection Agency (EPA). Access to the site may be provided through new driveways on Shiloh Road and Old Redwood Highway. The Koi Nation has indicated in its application that the BIA's acquisition of the project site for gaming purposes will establish: (i)

the first trust property for the Koi Nation on its restored lands in accordance with the Indian Gaming Regulatory Act (IGRA); and (ii) its economic land base in order to promote the general welfare of the Koi Nation and its members, raise governmental revenues, and create jobs for its members.

Alternatives: The Proposed Action encompasses the various federal approvals that may be required to implement the Proposed Project, including the placement of the site into federal trust for the Koi Nation for gaming purposes. The EA will identify and evaluate issues related to these approvals, and it will also evaluate a range of reasonable alternatives. Possible alternatives currently under consideration include: (i) the Proposed Project as described above; (ii) a reduced-intensity alternative; (iii) a non-gaming alternative; and (iv) a no action alternative. The range of alternatives to be addressed in the EA may be expanded or reduced during the scoping process.

Scope of the EA and Potential Environmental Effects: Issue areas identified for analysis in the EA include land resources/geology and soils; water resources; air quality/greenhouse gases; biological resources; cultural resources; socioeconomic conditions/environmental justice; transportation and circulation; land use; public services and utilities; noise; hazardous materials; aesthetics; and cumulative, indirect, and growth-inducing effects. The range of issues to be addressed in the EA may be expanded or reduced during the scoping process.

This section of this notice briefly discusses, based on current knowledge without the benefit of the environmental analysis that will be performed as part of the EA process, possible areas in which potential environmental impacts, including off-reservation impacts, attributable to the Proposed Project may occur. As noted above, the EA will include analysis of the Proposed Project's environmental impacts associated with the following resource areas:

- Land Resources/Geology and Soils – The Proposed Project would be constructed on the project site and will be built to applicable federal and state building code standards, including all applicable earthquake safety standards. It is therefore not anticipated that any people or structures would be subjected to adverse effects from earthquakes, ground shaking, seismic ground failure, landslides, or erosion as a result of the Proposed Project.
- Water Resources – The Proposed Project would be provided water supply and wastewater services through existing and proposed on-site wells and proposed on-site wastewater treatment and disposal systems. Recycled water generated by the proposed on-site WWTP would be used toilet/urinal flushing, cooling systems, and for irrigation of the vineyards and landscaping; thereby reducing the potable water demands of the Proposed Project. During the dry months of the year, excess recycled water would either be stored on-site in detention basin(s), or could be utilized to irrigate nearby agricultural fields and parks; during the rainy season, the tertiary treated effluent would be discharged to Pruitt Creek in accordance with an NPDES permit from the EPA and associated waste discharge requirements established to attain and maintain applicable water quality criteria to protect habitat and the designated beneficial uses of the creek. Construction of the Proposed Project could increase the potential for stormwater erosion and direct or indirect discharge of sediment and other materials into Pruitt Creek, which bisects the project site, and off-reservation drainages near the project site.
- Air Quality/Greenhouse Gases – The Proposed Project would generate short-term emissions, including dust, during the construction phase and long-term emissions from vehicle traffic, both of which could contribute to existing or projected air quality issues. Additionally, the Proposed Project would result in short-term emissions of greenhouse gas (GHG) associated

with construction and long-term GHG emissions primarily associated with vehicle traffic and energy usage, which could contribute to cumulative effects associated with climate change.

- Biological Resources – Construction activities for the Proposed Project would be on land that has already been disturbed with prior grading and development and is surrounded on all sides by development and agriculture. Accordingly, impacts to terrestrial biological resources would likely be minimal. Pruitt Creek, which bisects the site, is designated as critical habitat (pursuant to the federal Endangered Species Act), designated as essential fish habitat (pursuant to the Magnuson-Stevens Fishery Conservation and Management Act), and provides potential habitat for several federally-listed salmonids. To the extent feasible, the Proposed Project would avoid development within Pruitt Creek and associated riparian corridor. As described above, excess recycled water could be discharged to Pruitt Creek during the winter months under a NPDES permit from the EPA and associated waste discharge requirements established to attain and maintain applicable water quality criteria to protect habitat and the designated beneficial uses of the creek. Therefore, impacts to aquatic resources and fish species would likely be minimal.

- Cultural Resources – Construction activities for the Proposed Project would be on land that has already been disturbed with prior grading and development and is surrounded on all sides by development and agriculture. The nearest recorded archaeological resource is a lithic scatter approximately ¼ to ½ mile east of the Project site. Based on historic aerial review and the reconnaissance surveys, existing on-site structures were constructed after 1998 and thus do not meet the age eligibility of a historic resource (generally defined as 50 years or older). Accordingly, impacts to cultural resources would likely be minimal.

- Socioeconomics/Environmental Justice – The existing house on the project site is owned by the Koi Nation and not currently occupied; therefore, the Proposed Project would not displace any existing housing. The Proposed Project would provide new employment opportunities that could have an impact on housing availability. The Proposed Project will generate economic output and could result in substitution effects, fiscal effects, and social effects.
- Transportation and Circulation – The Proposed Project would generate additional vehicular use of certain public roads, contributing to increased traffic volumes and possible deterioration of levels of service.
- Land Use –The Proposed Project would be constructed on the project site after it is taken into federal trust, and it is therefore not anticipated that any off-reservation land use plan, policy, habitat conservation plan, or natural community conservation plan would apply to the Proposed Project. While project site is located near a large commercial center, the Proposed Project would maintain existing vineyard areas around the site perimeter to reduce the potential for land use conflicts with adjacent residential and agricultural uses.
- Public Services– It is anticipated that police and fire protection services would be provided to the Proposed Project by local jurisdictions. The Proposed Project would employ additional employees and attract additional patrons that could use public services and facilities. The Proposed Project would be provided water supply and wastewater services through existing and proposed on-site wells and proposed on-site wastewater treatment and disposal systems; therefore, no off-reservation extension or expansion of the Town of Windsor’s infrastructure would be needed to service the Proposed Project.
- Noise – Construction and operation of the Proposed Project could increase noise levels and vibration in areas near the Proposed Project.

- Hazardous Materials – Certain hazardous materials would be used in the construction and in the operation of the Proposed Project. Misuse of these materials or encounters with previously unknown contamination on the project site could occur.
- Aesthetics – The Proposed Project would change the visual character of the project site by introducing high intensity urban uses within the project site currently developed with vineyards and a rural residence. Additionally, the Proposed Project will introduce a new source of light and glare to the project area.

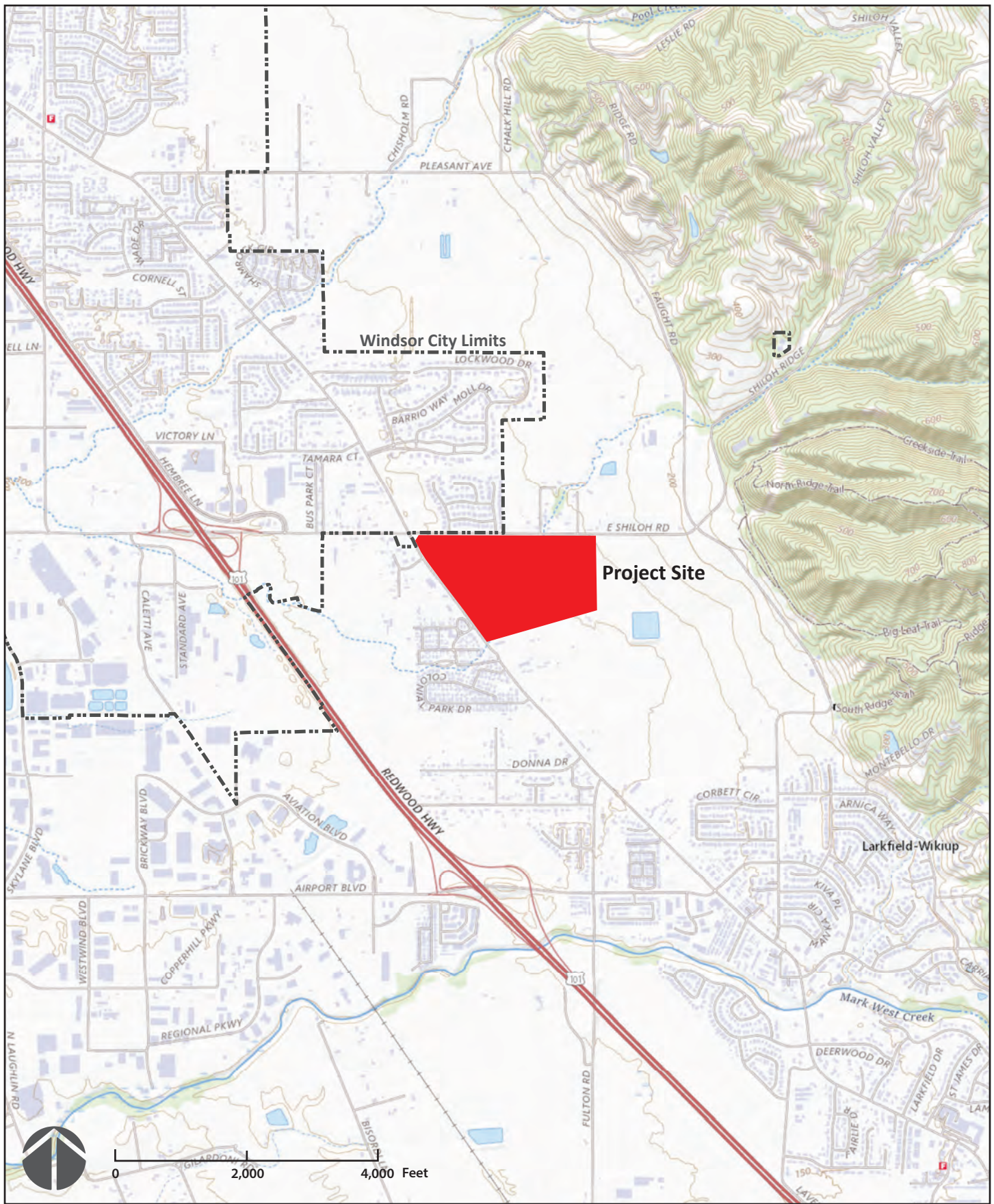
PUBLIC COMMENT AVAILABILITY: Comments, including names and addresses of respondents, will be available for public review at the BIA address shown in the ADDRESSES section, during regular business hours, 8 a.m. to 4:30 p.m., Monday through Friday, except holidays. Before including your address, telephone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask in your comment that your personal identifying information be withheld from public review, the BIA cannot guarantee that this will occur.

Dated: May 27, 2022



Source: Maxar imagery (4/16/2021)

FIGURE 1
REGIONAL LOCATION MAP



Source: USGS The National Map (June 2020)

FIGURE 2
VICINITY MAP



Source: Maxar imagery (4/16/2021)

FIGURE 3
PROJECT SITE

Attachment B

Proof of Publication

Koi Nation of Northern California Shiloh Resort and Casino Project

Summary

SCH Number	2022050599
Lead Agency	United States Department of the Interior
Document Title	Koi Nation of Northern California Shiloh Resort and Casino Project
Document Type	NOP - Notice of Preparation of a Draft EIR
Received	5/27/2022
Present Land Use	Land Intensive Agriculture and Limited Commercial
Document Description	The Proposed Action is the acquisition of approximately 68.6-acres of fee land in unin-corporated Sonoma County in trust by the Bureau of Indian Affairs upon which the Koi Nation would construct a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure (Proposed Project). Water supply to serve the project is proposed through the use of on-site wells, and wastewater would be treated via a proposed on-site tertiary wastewater treatment plant (WWTP).

Contact Information

Name	Chad Broussard
Agency Name	Bureau of Indian Affairs, Department of the Interior
Job Title	Environmental Protection Specialist
Contact Types	Lead/Public Agency
Address	2800 Cottage Way Room W-2820 Sacramento, CA 95852
Phone	(916) 978-6165
Email	chad.broussard@bia.gov
Name	Bibiana Alvarez
Agency Name	Acorn Environmental
Job Title	Project Manager
Contact Types	Consulting Firm
Address	

	5170 Golden Foothill Parkway El Dorado Hills, CA 95762
Phone	(916) 235-8224
Email	balvarez@acorn-env.com

Name	Darin Beltran
Agency Name	Koi Nation of Northern California
Job Title	Chairman
Contact Types	Project Applicant
Address	PO Box 3162 Santa Rosa, CA 95402
Phone	(707) 575-5586
Email	kn@koination.com

Location

Coordinates	38°31'26"N 112°46'25"W
Cities	Windsor
Counties	Sonoma
Regions	Countywide, San Francisco Bay Area, Unincorporated
Cross Streets	Old Redwood Highway and Shiloh Road
Zip	95403
Total Acres	68.6
Parcel #	059-300-003
State Highways	101
Airports	Sonoma County Airport
Waterways	Pruitt Creek
Township	8N
Range	8W
Section	18
Base	MtDiablo

Notice of Completion

State Review Period	5/27/2022
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Start

State Review Period End6/27/2022

State Reviewing AgenciesCalifornia Air Resources Board (ARB), California Department of Conservation (DOC), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Justice, Attorney General's Office, California Department of Parks and Recreation, California Department of Transportation, Division of Aeronautics (DOT), California Department of Transportation, Division of Transportation Planning (DOT), California Department of Water Resources (DWR), California Governor's Office of Emergency Services (OES), California Highway Patrol (CHP), California Natural Resources Agency, California Regional Water Quality Control Board, North Coast Region 1 (RWQCB), Department of General Services (DGS), Department of Toxic Substances Control, Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Water Rights, California Native American Heritage Commission (NAHC), California Department of Fish and Wildlife, Bay Delta Region 3 (CDFW), California Department of Transportation, District 4 (DOT)

State Reviewing Agency CommentsCalifornia Native American Heritage Commission (NAHC), California Department of Fish and Wildlife, Bay Delta Region 3 (CDFW), California Department of Transportation, District 4 (DOT)

Development TypesRecreational (Resort and Casino Facility)

Local ActionsNone - Fee-to-Trust Acquisition by BIA

Project IssuesAesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Fiscal Impacts, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, Wildfire

Local Review Period Start5/27/2022

Local Review Period End6/27/2022

Attachments

Draft Environmental Document [Draft IS, NOI_NOA_Public notices, OPR Summary Form, Appx,]

NOP_EA PDF 1705 K

Notice of Completion [NOC] Transmittal form

SCH NOC for NOP PDF 398 K

State Comment Letters [Comments from state reviewing agencies]

2022050599_CDFW Comment PDF 575 K2022050599_DOT Comment PDF 245 K2022050599_NAHC comment PDF 214 K

Disclaimer: The Governor’s Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at state.clearinghouse@opr.ca.gov or via phone at [\(916\) 445-0613](tel:9164450613). For more information, please visit [OPR’s Accessibility Site](#).

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA

County of Sonoma

I am a citizen of the United States and a resident of the county aforesaid: I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of The Press Democrat, a newspaper of general circulation, printed and published DAILY IN THE City of Santa Rosa, County of Sonoma; and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sonoma, State of California, under the date of November 29, 1951, Case number 34831, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates to wit:

The Press Democrat - Legal Notices

5/27 - 5/27/2022

I certify (or declare) under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Dated at Santa Rosa, California, on

May 27, 2022

SIGNATURE

Proof of Publication of

NOTICE OF PREPARATION OF AN ENVIRONMENTAL ASSESSMENT / TRIBAL ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: Koi Nation of Northern California Shiloh Resort and Casino Project

NEPA LEAD AGENCY: Bureau of Indian Affairs, Department of the Interior
TRIBAL LEAD AGENCY: Koi Nation of Northern California

SCOPING COMMENT PERIOD: Friday, May 27 - Monday, June 27, 2022.

SUMMARY: The Koi Nation of Northern California (Koi Nation) proposes to build a resort and casino on land that it owns in unincorporated Sonoma County, California adjacent to the Town of Windsor (Proposed Project), southeast of the intersection of Old Redwood Highway and Shiloh Road. As part of the Proposed Project, an application has been filed with the Bureau of Indian Affairs (BIA) to take approximately 68.6 acres of land into trust on behalf of the Koi Nation for gaming purposes. The federal actions necessary to implement the Proposed Project trigger the requirements of the National Environmental Policy Act (NEPA).

This notice advises the public that the BIA, as NEPA lead agency, intends to gather information necessary for preparing an Environmental Assessment (EA) pursuant to NEPA in connection with the Proposed Project.

Additionally, based on the anticipated requirements of a future Tribal-State Compact between the State of California and the Koi Nation, a Tribal Environmental Impact Report (TEIR) will be required to analyze the potential off-reservation environmental impacts of the Proposed Project. To reduce paperwork and eliminate redundancy, the TEIR will be prepared in coordination with the Environmental Assessment EA, resulting in a joint "EA/TEIR" (herein referred to as an "EA"). This notice announces and opens a public scoping process for the EA. Interested parties are invited to submit comments identifying potential environmental issues, concerns, reasonable mitigation measures, and alternatives to be considered in the EA. A copy of the full Notice of Preparation, which includes a project description and location figures, as well as a brief description of the environmental areas in which off-Reservation impacts attributable to the Proposed Project will be evaluated, is available online at the project website: shilohresortenvironmental.com.

DATES: Written comments on the scope of the EA should be sent as soon as possible and no later than Monday, June 27, 2022 (30 days after publication of this notice in The Press Democrat). (An additional comment period for the draft EA will be announced at a later date through the publication of a Notice of Availability.)

ADDRESSES: You may mail or hand-deliver written comments to Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way, Sacramento, CA 95825. Please include your name, return address, and "Koi Nation Shiloh Resort and Casino Project" on the first page of your written comments. You may also submit comments through email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Koi Nation Shiloh Resort and Casino Project" as the subject of your email.

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129313 - Pub May 27, 2022

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Shiloh Resort and Casino Project
EA/TEIR NOP Mailing List

First Name	Last Name	Title	Affiliation	Send Certified?	Fed Ex #	Date Sent?	Confirmation Received?
Agencies							
			Sonoma County Board of Supervisors Department	1	776973704123	5/26/2022	Yes
			Permit Sonoma Director	1	776973732671	5/26/2022	Yes
Patrick	Streeter	Community Development	Windsor Planning Division	1	776973757035	5/26/2022	Yes
			Windsor Town Council	1	776973791523	5/26/2022	Yes
Jared	Huffman	Member of Congress	Congress of the United States, House of Representatives	0 N/A		5/26/2022	N/A
			California Gambling Control Commission	1	776974717900	5/26/2022	Yes
Tribes							
Margie	Mejia	Tribal Chairperson	Lytton Rancheria	1	776973818225	5/26/2022	Yes
Greg	Sarris	Tribal Chairman	Graton Rancheria	1	777014953873	6/1/2022	Yes
Reno	Keoni Frankli	Tribal Chairman	Kashia Band of Pomo Indians	1	777028467770	6/2/2022	Yes
Chris	Wright	Tribal Chairman	Dry Creek Rancheria	1	777015049725	6/1/2022	Yes
Delores	Pigsley	Tribal Chairman	Confederated Tribes of Siletz Indians Tribal Council	0 N/A		5/26/2022	N/A
Patricia	Hermosillo	Tribal Chairperson	Cloverdale Rancheria	1	776974684499	5/26/2022	Yes
Organizations							
Nina	Cote	Steering Committee Chair	Our Community Matters	0 N/A		5/26/2022	N/A
Cheryl	Schmit	N/A	Stand Up for California	0 N/A		5/26/2022	N/A
Individuals							
Daniel and Camilla	Heidenreich	N/A	N/A	0 N/A		5/26/2022	N/A
Meredith	Strom	N/A	N/A	0 N/A		5/26/2022	N/A
Sean	Harrell	N/A	N/A	0 N/A		5/26/2022	N/A
Betsy	Mallace	N/A	N/A	0 N/A		5/26/2022	N/A
Anne	Keck	N/A	Keck Law Offices	0 N/A		5/26/2022	N/A
Aaron	Ziskin	N/A	N/A	0 N/A		5/26/2022	N/A
Mark	Catelani	N/A	N/A	0 N/A		5/26/2022	N/A
Brenda	Catelani	N/A	N/A	0 N/A		5/26/2022	N/A
Georgianne	Boissier	N/A	N/A	0 N/A		5/26/2022	N/A
Anthony	Sarto	N/A	N/A	0 N/A		5/26/2022	N/A
Joan	Chance	N/A	N/A	0 N/A		5/26/2022	N/A
Abby	Fletcher	N/A	N/A	0 N/A		5/26/2022	N/A
Lance	Cottrell	N/A	N/A	0 N/A		5/26/2022	N/A
Cameron	Barfield	N/A	N/A	0 N/A		5/26/2022	N/A
Lynn	Darst	N/A	N/A	0 N/A		5/26/2022	N/A
Cory	Thomas	N/A	N/A	0 N/A		5/26/2022	N/A
Kristine	Hannigan	N/A	N/A	0 N/A		5/26/2022	N/A
Lynda	Williams	N/A	N/A	0 N/A		5/26/2022	N/A
James	Fletcher	N/A	N/A	0 N/A		5/26/2022	N/A

Attachment C

Scoping Comments

Scoping Comment Letters

First Name	Last Name	Organization	Date
Agencies			
Jared	Huffman	Congress of the United States, House of Representatives	4/25/2022
Pricilla	Fuentes-Torres	Native American Heritage Commission	5/27/2022
Sheryl	Bratton	Sonoma County, Office of the County Administrator	6/14/2022
Mark	Linder	Town of Windsor	6/21/2022
Erin	Chappell	California Department of Fish and Wildlife	6/22/2022
Patrick	Streeter	Town of Windsor	6/23/2022
Mark	Leong	California Department of Transportation, District 4	6/27/2022
Christina	Rivera	Sonoma County, Office of the County Administrator	6/27/2022
Michael	Thompson	Congress of the United States, House of Representatives	6/30/2022
Tribes			
Chris	Wright	Dry Creek Rancheria	9/23/2021
Patricia	Hermosillo	Cloverdale Rancheria	10/13/2021
Margie	Mejia	Lytton Rancheria	10/20/2021
Greg	Sarris	Graton Rancheria	4/12/2022
Reno	Franklin	Kashia Band of Pomo Indians	4/14/2022
Chris	Wright	Dry Creek Rancheria	4/20/2022
Delores	Pigsley	Confederated Tribes of Siletz Indians	5/17/2022
Greg	Sarris	Graton Rancheria	6/14/2022
Patricia	Hermosillo	Cloverdale Rancheria	6/22/2022
Chris	Wright	Dry Creek Rancheria	6/27/2022
Greg	Sarris	Graton Rancheria	6/27/2022
Organizations			
Cheryl	Schmit	Stand Up for California	9/20/2021
Cheryl	Schmit	Stand Up for California	10/25/2021
Nina	Cote	Our Community Matters	12/1/2021
Josh	Ratiani	Shiloh Neighborhood Church	6/14/2022
Padi	Selwyn	Preserve Rural Sonoma County	6/16/2022
Jay	Bradshaw	Nor Cal Carpenters Union	6/17/2022
Nina	Cote	Our Community Matters	6/27/2022

First Name	Last Name	Organization	Date
Individuals			
Lynda	Williams		9/19/2021
Kristine	Hannigan		9/21/2021
Cory	Thomas		9/23/2021
Lynn	Darst		9/23/2021
Cameron	Barfield		9/26/2021
Lance	Cottrell		9/27/2021
Abby	Fletcher		10/1/2021
James	Fletcher		10/1/2021
Joan	Chance		10/1/2021
Anthony	Sarto		10/2/2021
Georgianne	Boissier		10/2/2021
Brenda	Catelani		10/5/2021
Mark	Catelani		10/5/2021
Anne	Keck	Keck Law Offices	10/5/2021
Aaron	Ziskin		10/6/2021
Tyler	Ziskin		10/6/2021
Denise	Ziskin		10/6/2021
Don	Ziskin		10/6/2021
Betsy	Mallace		10/14/2021
Daniel & Camilla	Heidenreich		10/15/2021
Sean	Harrell		11/11/2021
Meredith	Strom		11/28/2021
Cameron	Barfield		6/5/2022
Rachel	Jackson		6/9/2022
Michael	Donovan		6/13/2022
Letitia	Caruso		6/14/2022
James	Gilbert		6/14/2022
Virginia	Gillen		6/14/2022
Carrie	Marvin		6/14/2022
Kathy	Parnay		6/14/2022
Elizabeth	Acosta		6/15/2022

First Name	Last Name	Organization	Date
Rosanna	Arndt		6/15/2022
Debra	Avanche		6/15/2022
Diane	Baines		6/15/2022
Robert	Brink		6/15/2022
Louise	Calderon		6/15/2022
Mike	Carlson		6/15/2022
Martha	Clark		6/15/2022
Judith and John	Coppedge		6/15/2022
Sidnee	Cox		6/15/2022
Deborah	Curle		6/15/2022
Unknown			6/15/2022
Christine	Daniels		6/15/2022
Christy	Delucchi		6/15/2022
Eddie	Flayer		6/15/2022
Lorenzo	Freschet		6/15/2022
Fredric	Fuchs		6/15/2022
Pamela	Geiss		6/15/2022
Patty	Grimm		6/15/2022
Dwight	Haldan		6/15/2022
Josh	Hammer		6/15/2022
Kristine	Hannigan		6/15/2022
Kristine	Hannigan		6/15/2022
Kristine	Hannigan		6/15/2022
Gregory and Janine	Heath		6/15/2022
Mary	Hess		6/15/2022
Michael	Higgins		6/15/2022
Amy and Chris	Hoover		6/15/2022
Eva	Ingrum		6/15/2022
Jonathan	Marvin		6/15/2022
Steven	Karp		6/15/2022
Mary-Frances	Makichen		6/15/2022
Morgan	Marchbanks		6/15/2022

First Name	Last Name	Organization	Date
Janet	Marsten		6/15/2022
Clarence and Belva	Mitchell		6/15/2022
Julaine	Neff		6/15/2022
MJ	Nelson		6/15/2022
Jill	Plamann		6/15/2022
Steve	Plamann		6/15/2022
Elizabeth	Pulcheon		6/15/2022
Jane	Robinson		6/15/2022
Tim	Ryan		6/15/2022
Marie	Salerno		6/15/2022
Mary	Stuart		6/15/2022
Tom	Thornsley		6/15/2022
Joyce	Ulrich		6/15/2022
Gary	Velasquez		6/15/2022
Charles	Williams		6/15/2022
Claudia	Abend		6/16/2022
Kayla	Anderson		6/16/2022
W.K	Bedsole		6/16/2022
Walter	Bruszewski		6/16/2022
Scott and Karen	Burkett		6/16/2022
Byron	Calos		6/16/2022
Sandy	Chapman		6/16/2022
Barbara	Cottrell		6/16/2022
Gabriel	Greene		6/16/2022
Chris and Nancy	Handel		6/16/2022
Daniel	Heidenreich		6/16/2022
Kari and John	Kincheloe		6/16/2022
Larry	Lapides		6/16/2022
Lance	Cottrell		6/16/2022
Lynda	Williams		6/16/2022
Mary	McCarty		6/16/2022
Therese	Menzel		6/16/2022

First Name	Last Name	Organization	Date
Sandra	Oakes-Arriola		6/16/2022
Victoria	Osten		6/16/2022
Carol	Rash		6/16/2022
Barbara	Reed		6/16/2022
Vincent	Stockette		6/16/2022
Marilyn	Parsons-Volpert		6/16/2022
Judy	Witwicki		6/16/2022
Tisha	Zolnowsky		6/16/2022
C	Belden		6/17/2022
John	Baird		6/17/2022
Paul and Stephanie	Browning		6/17/2022
Paul	Browning		6/17/2022
Brenda	Catelani		6/17/2022
Geoff	Coleman		6/17/2022
Michael	Cote		6/17/2022
Robert	Eberling		6/17/2022
Bonnie	Farrow		6/17/2022
Melissa	Airoidi		6/17/2022
Susan	Pulcheon		6/17/2022
Meredith	Strom		6/17/2022
Nancy	Thomas		6/17/2022
Lonn	Thomas		6/17/2022
Rachel	Verdugo		6/17/2022
Richard	Addison		6/18/2022
C	Belden		6/18/2022
Diana	Borges		6/18/2022
Richard	Boyd		6/18/2022
Pam	Bruszewski		6/18/2022
Eric	Lucas		6/18/2022
Harold	Minkin		6/18/2022
Katherine	Schram		6/18/2022
James	Costello		6/19/2022

First Name	Last Name	Organization	Date
Nina	Cote		6/19/2022
Marie	Fanelli		6/19/2022
Sue	Frey		6/19/2022
Bob and Nancy	Jenkins		6/19/2022
Mary	Lopez		6/19/2022
Ron and Carrie	Myers		6/19/2022
James and Linda	Selby		6/19/2022
Rachel	Verdugo		6/19/2022
Tim	Madura		6/19/2022
Amy	Banfill		6/20/2022
John	Bocci		6/20/2022
Ronald	Calloway		6/20/2022
Peg	Champion		6/20/2022
Dinah	Costello		6/20/2022
Barbara	Cottrell		6/20/2022
Cecilia	Domenichelli		6/20/2022
Josephine	Hamilton		6/20/2022
Camilla and Daniel	Heidenreich		6/20/2022
Heidi	Jacquin		6/20/2022
Mark	Kimmel		6/20/2022
Jennifer and Jaime	Lopez		6/20/2022
Lance	Cottrell		6/20/2022
Paige	Mazzoni		6/20/2022
Lynette	McGee		6/20/2022
Spencer	Pahlke		6/20/2022
Anyia	Piazza-Lyons		6/20/2022
Justina	Sessions		6/20/2022
Ramona	Turner		6/20/2022
Betty	Winholtz		6/20/2022
Diane	Winsby		6/20/2022
Walter	Winsby		6/20/2022
Denise	Ziskin		6/20/2022

First Name	Last Name	Organization	Date
Claudia	Abend		6/21/2022
William	Ardizoia		6/21/2022
Kathleen	Duffy		6/21/2022
Scott and Kathleen	Huhn		6/21/2022
Linda	Leao		6/21/2022
Suzanne	Malay		6/21/2022
Suzanne	Malay		6/21/2022
Matthew	Maring		6/21/2022
Michael and Kathi	Mayer		6/21/2022
Patrick	Munsch		6/21/2022
Kenneth	Pietrelli		6/21/2022
Fran	Soiland		6/21/2022
Joseph	Syufy		6/21/2022
Tom	Thornsley		6/21/2022
C	Belden		6/22/2022
Jim	Boissier		6/22/2022
Lynn	Darst		6/22/2022
Brian	Moe		6/22/2022
Janice	Sexton		6/22/2022
Brian	Siewert		6/22/2022
Hollis	Stavn		6/22/2022
Tom	Beckman		6/23/2022
Kacy	DeHaven		6/23/2022
Scott	Gibson		6/23/2022
Doug	Knight		6/23/2022
Dahdri	McCormick		6/23/2022
Therese	Mrozek		6/23/2022
Alan	Phillips		6/23/2022
Cliff	Whittemore		6/23/2022
Richard	Abend		6/24/2022
Lynn	Caruso		6/24/2022
Joan	Gibson		6/24/2022

First Name	Last Name	Organization	Date
Carlyn	Knight		6/24/2022
Laurie	Landry		6/24/2022
Dana	Murphy		6/24/2022
Shannon	Schiller		6/24/2022
Mark	Catelani		6/25/2022
Carl	Euphrat		6/25/2022
Mary	Euphrat		6/25/2022
Betsy	Mallace		6/25/2022
Gino	Rantissi		6/25/2022
Graham	Rutherford		6/25/2022
Anthony	Sarto		6/26/2022
MaryAnn	Bainbridge-Krause		6/26/2022
Greg	Banfill		6/26/2022
C	Belden		6/26/2022
Robert	Cobb		6/26/2022
David and Sandra	George		6/26/2022
Paul	Godowski		6/26/2022
Matt	Gustafson		6/26/2022
Robin	Jaskela		6/26/2022
Don and Terri	Jensen		6/26/2022
Michele	Kipp		6/26/2022
Debra	Lopeman		6/26/2022
Christina	Moran		6/26/2022
Amy	Ramsey		6/26/2022
Rosa	Reynosa		6/26/2022
Kurt	Shaver		6/26/2022
Claudia	Volpi		6/26/2022
Betty	Winholtz		6/26/2022
Perry	Austin		6/27/2022
Marc	Chandler		6/27/2022
Catherine	Ernst		6/27/2022
Robert	Janes		6/27/2022

First Name	Last Name	Organization	Date
Hahna	Kaiser		6/27/2022
Rochell	Letasi		6/27/2022
A.P	Marsten		6/27/2022
Pam	Janes		6/27/2022
Danelle and Mario	Rosati		6/27/2022
Rachel	Shadburne		6/27/2022
David	Sussman		6/27/2022
Unknown			6/27/2022
Dylan	Whittemore		6/27/2022
Brian	Williams		6/27/2022
Marquel	Abend		6/28/2022
David	Jacquín		6/28/2022
Carol	Bloom		6/29/2022

Comment Letters

Agencies

JARED HUFFMAN
2ND DISTRICT, CALIFORNIA

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1527 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
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Congress of the United States
House of Representatives
Washington, DC 20515-0502

COMMITTEE ON
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WATER RESOURCES AND ENVIRONMENT
SELECT COMMITTEE ON THE
CLIMATE CRISIS

April 25, 2022

The Honorable Deb Haaland
Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Haaland:

I am writing to express my opposition to the Koi Nation's application to acquire 68 acres of land into trust for a casino in Sonoma County in the Second District of California. While I remain a champion for tribal interests, I would like to bring to your attention serious concerns raised by both the tribes with ancestral ties to the land and the neighboring constituents that render the proposed plans inappropriate for the area.

Federal law requires that a restored tribe have a "significant historical connection" to the land where it proposes to game, but the land in question is over 50 miles from the Koi Nation's ancestral land in the Lower Lake area of Lake County. The Koi Nation also lacks evidence of a historical connection such as ancestral villages, burial sites, or subsistence use of the land. Further, the tribes that *are* indigenous to Sonoma County including the Federated Indians of Graton Rancheria, Dry Creek Rancheria Band of Pomo Indians, Cloverdale Rancheria, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, and Lytton Rancheria oppose both the proposed project and the Koi Nation's ancestral claims to the land. The Sonoma County Board of Supervisors also shares these concerns and passed a resolution opposing the establishment of this casino within the County.

In addition, I have heard from constituents in the area about concerns over the intended use of the land for a casino. The proposed project would be located in a residential area with elementary schools, parks and religious centers in close proximity. The anticipated traffic from a casino could pose a danger to these residents and this would be exasperated when considering wildfire evacuation routes and the thousands of vehicles that could be added to the road from the project.

Thank you for your full, fair and serious consideration of my request for you to reject the Koi Nation's application to acquire this land in trust and the proposed casino. Should you have any

SAN RAFAEL
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SAN RAFAEL, CA 94901
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PETALUMA, CA 94952
PHONE: (707) 981-8967
FAX: (415) 258-9913

UKIAH
200 S. SCHOOL ST., SUITE 1
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PHONE: (707) 671-7449
FAX: (707) 962-0905

FORT BRAGG
430 NORTH FRANKLIN STREET
P.O. BOX 2208
FORT BRAGG, CA 95437
PHONE: (707) 962-0933
FAX: (707) 962-0905

EUREKA
317 THIRD STREET, SUITE 1
EUREKA, CA 95501
PHONE: (707) 407-3585
FAX: (707) 407-3559

questions about this request please contact Casey MacLean on my staff at
Casey.MacLean@mail.house.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared Huffman", with a long horizontal flourish extending to the right.

JARED HUFFMAN
Member of Congress



NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning & Research

May 27, 2022

May 27 2022

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Nomlaki

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Chad Broussard
Department of Interior, Bureau of Indian Affairs
2800 Cottage Way, Room W-2820
Sacramento, CA 95852

Re: 2022050599, Koi Nation of Northern California Shiloh Resort and Casino Project, Sacramento County

Dear Mr. Broussard:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Pricilla.Fuentes-Torres@nahc.ca.gov.

Sincerely,

Pricilla Fuentes-Torres

Pricilla Fuentes-Torres
Cultural Resources Analyst

cc: State Clearinghouse



OFFICE OF THE COUNTY ADMINISTRATOR

COUNTY OF SONOMA

575 ADMINISTRATION DRIVE – ROOM 104A
SANTA ROSA, CALIFORNIA 95403-2888
TELEPHONE (707) 565-2431
FAX (707) 565-3778

SHERYL BRATTON
COUNTY ADMINISTRATOR

CHRISTINA RIVERA
ASSISTANT COUNTY ADMINISTRATOR

PETER BRULAND
DEPUTY COUNTY ADMINISTRATOR

BARBARA LEE
DEPUTY COUNTY ADMINISTRATOR

CHRISTEL QUERIJERO
DEPUTY COUNTY ADMINISTRATOR

June 14, 2022

Bureau of Indian Affairs, Pacific Region
Attn: Amy Dutschke, Regional Director
2800 Cottage Way
Sacramento, CA 95825

RE: Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report for the Koi Nation of Northern California Shiloh Resort and Casino Project

Director Dutschke,

To adequately review and provide comments to your agency, the County of Sonoma urgently requests a public scoping session and 30-day extension of time to submit comments on the project. We request that public comment opportunities and scoping sessions be noticed in newspapers and media with local circulation, such as the *Press Democrat*. We request that public sessions be offered virtually or an in-person/virtual hybrid to mitigate Covid risk.

As a matter of procedural efficiency, the BIA should not move forward with NEPA review for the Koi Nation's application filed under the Part 151 process without first rendering a decision on the Koi Nation's application for a restored lands determination. The County received from all federally recognized southern and south-western Pomo tribes in Sonoma County letters or tribal resolutions opposing the Koi Nation's request to have land taken into trust near the City of Windsor. The County Board of Supervisors passed a resolution on April 2, 2022 opposing establishment of the project as proposed by the Koi Nation, a non-Sonoma County tribe.

On May 26, 2022, the County of Sonoma received the Notice of Preparation (NOP), for the Koi Nation of Northern California Shiloh Resort and Casino Project (Proposed Project). The Proposed Project is to be built outside of, but contiguous to, the Town of Windsor. The project site is bordered by Shiloh Road and residential parcels to the north, Old Redwood Highway and residential parcels to the west, and agricultural and commercial parcels in unincorporated Sonoma County to the south and east. According to the NOP, the Proposed Project includes the acquisition of land in trust for gaming, the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site.

Among the County's concerns are that this is a large gaming and resort development in a wild-fire prone and environmentally sensitive area, with poor alternative access routes, that is proximate to residential development and park and agricultural land, in addition to being located within voter approved community separator lands. The BIA should prepare a thorough Environmental Impact Statement for this project under NEPA, with full public noticing, vetting, and participation.

The County has several questions regarding the 'joint' environmental document. The NOP describes the document to be prepared as a joint Environmental Assessment, and a tribal Environmental Impact Report. Please identify the standards applicable to preparation of the *tribal EIR* and, if the standards do not exist in current federal or state law, provide a copy of the standards to the County of Sonoma. The subject land is not currently in trust, and there is no intergovernmental agreement between the County of Sonoma and the Koi Nation related to environmental review or mitigation, nor is there a Tribal-State compact between the Koi Nation and the State of California that would address tribal environmental review. We note that where an EIS is required under NEPA, it must be prepared, regardless of whether a tribal EIR is also prepared.

The County intends to supplement this comment letter with additional comments on the NOP/scoping for the project to the extent feasible during the limited time provided for comment. The County appreciates the opportunity to provide comment on the proposed project and hopes that your agency meaningfully considers the requests in this letter. We also look forward to a dialogue with your agency and the tribe. Please contact Intergovernmental Affairs Coordinator Marissa Montenegro at Marissa.montenegro@sonoma-county.org or 707-565-3771 if additional time for comment will be provided or if you have any questions about this letter.

Sincerely,



SHERYL BRATTON
County Administrator

From: Town of Windsor
Sent: Tuesday, June 21, 2022 5:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi casino project

Mr. Broussard,

The Town of Windsor will have our Environmental comments in for the proposed Koi Casino project before the June 27 deadline. We are getting some community member requests for a 30 extension to enable more community comments. I do not know if that is possible. I promised one of my Councilmembers I would ask.

Thank you.

Mark Linder
Interim Town Manager
Town of Windsor
408 891-8912



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 22, 2022

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Department of the Interior
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825
chad.broussard@bia.gov

Subject: Koi Nation of Northern California Shiloh Resort and Casino Project, Notice of Preparation of an Environmental Assessment/Tribal Draft Environmental Impact Report, SCH No. 2022050599, Sonoma County

Dear Mr. Broussard:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of an Environmental Assessment/Tribal Draft Environmental Impact Report (EIR) from the Bureau of Indian Affairs, Department of the Interior (DOI) for the Koi Nation of Northern California Shiloh Resort and Casino Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW is submitting comments on the NOP to inform DOI, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION AND LOCATION

The Project would develop a casino, hotel, conference/event center, restaurant/bars, and supporting infrastructure, including parking, on a 68.6-acre site that is currently an operating vineyard bisected by Pruitt Creek. The Project is located just southeast of the City of Windsor in an unincorporated area of Sonoma County, immediately southeast of

¹ CEQA is codified in California Public Resources Code section 21000 et seq. The "CEQA Guidelines" are found in California Code of Regulations, title 14, section 15000 et seq.

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Department of the Interior
June 22, 2022
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the Shiloh Road and Old Redwood Highway intersection, on Assessor's Parcel Number 059-300-003, and centered at approximately Latitude 38.523697°N, Longitude 122.774112°W.

The CEQA Guidelines require that the EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description, as applicable:

- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in take of plants or animals listed under CESA, either during construction or over the life of the Project.² If the Project will impact CESA listed species, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. **Based on a review of Google Earth imagery, it appears there is a roadside drainage on the east side of Old Redwood Highway which may include wetland habitat suitable to support Burke's goldfields (*Lasthenia burkei*) and Sebastopol meadowfoam (*Limnanthes vinculans*), both of which are CESA and federally listed as endangered species.** Both species have been observed in artificially-created depressions such as drainage ditches according to the 2016 U.S. Fish and Wildlife Service (USFWS) Recovery Plan for the Santa Rosa Plain.

Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program.

² Take is defined in Fish and Game Code section 86 as hunt, pursue, catch, capture, or kill, or attempt any of those activities.

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CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also subject to notification. **According to the NOP, the Project would avoid development within Pruitt Creek and the associated riparian corridor to the extent feasible, therefore it appears impacts to Pruitt Creek may occur. Additionally, the above-mentioned roadside drainage may constitute a stream within the Project area.** CDFW, as a responsible agency under CEQA, will consider the EIR for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA as the responsible agency.

Nesting Birds

CDFW also has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, their eggs, and nests. Migratory birds are also protected under the federal Migratory Bird Treaty Act.

Fully Protected Species

Fully Protected species, including any listed in Attachment 1, may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

ENVIRONMENTAL SETTING

The EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

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CDFW recommends that the EIR provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands, vernal pools, and/or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site. Fully protected, threatened or endangered, or other special-status species and sensitive natural communities that are known to occur, or have the potential to occur in or near the Project area, include but are not limited to, those listed in Attachment 1.³

Habitat descriptions and the potential for species occurrence should include information from multiple sources, such as aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; the USFWS' Information, Planning, and Consultation System; findings from positive occurrence databases such as the California Natural Diversity Database (CNDDDB); and sensitive natural community information available on Sonoma County fine scale vegetation and habitat map.⁴ Based on the data and information from the habitat assessment, the EIR should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available.⁵

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank must be conducted during the blooming period for all species potentially impacted by the Project within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrological conditions, and require the identification of reference populations. More than one year of surveys may be necessary given environmental conditions.^{6, 7, 8}

³ For sensitive natural communities see <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

⁴ For the Sonoma County fine scale vegetation and habitat map see <https://sonomavegmap.org/blog/category/fine-scale-vegetation-and-habitat-map/>

⁵ Survey and monitoring protocols and guidelines are available at <https://wildlife.ca.gov/Conservation/Survey-Protocols>.

⁶ CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere while Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

⁷ <http://www.cnps.org/cnps/rareplants/inventory/>

⁸ Please refer to CDFW protocols for surveying and evaluating impacts to rare plants, and survey report requirements at <https://wildlife.ca.gov/Conservation/Plants>

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The EIR should include an evaluation of County of Sonoma stream and riparian corridor setback requirements and require the Project to adhere to any such requirements to protect sensitive stream habitat.⁹

IMPACT ANALYSIS AND MITIGATION MEASURES

The EIR should discuss all direct and indirect impacts (temporary and permanent), including reasonably foreseeable impacts, that may occur with implementation of the Project (CEQA Guidelines, §§ 15126, 15126.2, & 15358). This includes evaluating and describing impacts such as:

- Encroachments into riparian habitats, drainage ditches, wetlands, or other sensitive areas such as stream and riparian corridor setback areas required by Sonoma County.
- Potential for impacts to special-status species or sensitive natural communities.
- Loss or modification of breeding, nesting, dispersal, and foraging habitat, including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g., snags, rock outcrops, overhanging banks).
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, or human presence.
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The EIR should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to the impact (CEQA Guidelines, § 15355). Although a project's impacts may be less than significant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact, e.g., reduction of habitat for a special-status species, should be considered cumulatively considerable.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the Lead Agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the EIR, and mitigate potentially significant impacts of the Project on the environment (CEQA

⁹ For Sonoma County stream and riparian corridor setback requirements see <https://permitsonoma.org/instructionsandforms/drn-005waterwaysetbackrequirements#:~:text=Stream%20and%20Water%20Feature%20Setbacks%20for%20Grading%20Work&text=Grading%20work%20and%20land%20disturbance,090>

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Guidelines, §§ 15021, 15063, 15071, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. Project-specific measures should be incorporated as enforceable Project conditions to reduce impacts to biological resources to less-than-significant levels.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.


FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist NOI in identifying and mitigating Project impacts on biological resources. If you have any questions, please contact Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or melanie.day@wildlife.ca.gov, or Craig Weightman, Environmental Program Manager, at craig.weightman@wildlife.ca.gov or (707) 339-1332.

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species & Sensitive Natural Communities

ec: State Clearinghouse (SCH No. 2022050599)

Chad Broussard, Environmental Protection Specialist
 Bureau of Indian Affairs, Department of the Interior
 June 22, 2022
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Attachment 1: Special-Status Species & Sensitive Natural Communities

Scientific Name	Common Name	Status
Birds		
<i>Athene cunicularia</i>	burrowing owl	SSC
<i>Elanus leucurus</i>	white-tailed kite	FP
Fish		
<i>Oncorhynchus mykiss</i>	central California coast winter steelhead	FT
Amphibians		
<i>Rana draytonii</i>	California red-legged frog	FT, SSC
<i>Rana boylei</i>	foothill yellow-legged frog, northwest/north coast clade	SSC
<i>Dicamptodon ensatus</i>	California giant salamander	SSC
<i>Taricha rivularis</i>	Red bellied newt	SSC
Mammals		
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC
<i>Antrozous pallidus</i>	pallid bat	SSC
Reptiles		
<i>Emys marmorata</i>	western pond turtle	SSC
Plants		
<i>Lasthenia burkei</i>	Burke's goldfields	SE, FE, CRPR 1B.1
<i>Limnanthes vinculans</i>	Sebastopol meadowfoam	SE, FE, CRPR 1B.1
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	congested-headed hayfield tarplant	CRPR 1B.2
Additional special-status plants are documented in the Project vicinity, see CNDDDB		
Sensitive Natural Communities		
<i>Quercus lobata</i>	Valley oak riparian forest	S3

FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; SE = state listed as endangered under CESA; FP = state fully protected under Fish and Game Code; SSC = state Species of Special Concern; CRPR = California Rare Plant Rank; S1-S3 = Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents



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Mayor
Sam Salmon

Vice Mayor
Esther Lemus

Councilmember District 3
Debora Fudge

Councilmember
Rosa Reynoza

Councilmember
Mike Wall

Interim Town Manager
Mark Linder

Sent via Email
June 23, 2022

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

SUBJECT: Koi Nation Shiloh Resort and Casino Project
Town of Windsor Comments on Notice of Preparation of an
Environmental Assessment/Tribal Environmental Impact Report

Dear Ms. Dutschke:

The Town of Windsor hereby submits comments in response to the Koi Nation Shiloh Resort and Casino Project Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report (NOP). The comments that follow are organized according to the resource areas described for analysis in the NOP. It should be noted that the scope of the Environmental Assessment does not include analysis for potential environmental effects associated with paleontological resources. Additionally, if any part of the project is subject to the California Environmental Quality Act (CEQA), then analysis for wildfire and for energy impacts will be required.

Water Resources

- The Project proposes to construct wells on the property for potable water use. Be advised that the Town of Windsor has two wells at Esposti Park, north and across the street from the Project property. The Town is preparing a Groundwater Master Plan where one well may be permitted as a municipal well with an arsenic and manganese treatment system. The Project wells and Project wastewater treatment plant should not be constructed within the protection zone around the Town well. A well interference study should be completed as part of the Project to ensure proper placement in the southeastern portion of the Project property, the farthest location away from the Town wells. Hydrogeologic testing should be completed to ensure Project wells will not adversely affect the radius of influence nor the water quality of the Town well.
- Pruitt Creek recycled water discharges, and any storm drain system discharges, could cause erosion and increased sediment discharge into the creek that already appears to be showing signs of erosion. The discharge location should be designed to be protective of the creek and not cause any additional downstream erosion.
- Use of recycled water on landscaping should not be allowed within the protection zone of the Town well.
- The use of a detention basin should not be constructed within the protection zone of the Town well.
- With the proposed commercial activity, trash removal should be addressed along the creek corridor and storm drain system to keep trash from flowing

downstream and into the Town of Windsor, where compliance with the State Trash Amendment will be required. Mitigation should be added to keep the creek and drainage system free of trash.

- The subject property is not within the Town of Windsor or the Windsor Water District boundaries and is therefore not available to be served by the Town of Windsor or Windsor Water District services (supply or reclamation).
- The Town of Windsor completed a Storm Drainage Master Plan where the 100-year flood zones were mapped. The Project location shows potential flooding during the 100-year floods. The Project will need to consider flood mitigations, so it does not affect the downstream neighborhoods with additional flooding or sediment transport.

Biological Resources

- Potential impacts to terrestrial biological resources, including wildlife habitat and wildlife corridors along Pruitt Creek should be analyzed.

Cultural Resources

- Cultural resources, including tribal cultural resources are often found along creeks and waterways throughout Sonoma County. Because archaeological resources have been recorded within ½ to ¼ mile of the site and because of the presence of Pruitt Creek through the site, impacts to cultural resources may not necessarily be minimal as described in the scope of the Environmental Assessment.

Transportation and Circulation

US 101/Shiloh Road Interchange

- Determine the roadway improvements that the project will be responsible for constructing in order to maintain traffic flow at the interchange and maintain consistency with the Town's LOS D traffic operation standard. Include a queueing analysis and identify the infrastructure improvements needed to ensure that traffic does not routinely back up into adjacent intersections (such as Shiloh Road/Hembree Lane) or onto the US 101 mainline.
- Analyze pedestrian and bicycle circulation in the interchange area, identifying infrastructure improvements needed to ensure that these non-auto users can traverse the interchange easily, safely, and conveniently.

Shiloh Road Corridor

- Analyze traffic operation along the Shiloh Road corridor between US 101 and the project site during weekday and weekend peak hours and identify improvements needed not only to maintain traffic flow, but to provide critical east-west connectivity for bicyclists, pedestrians, and transit along this corridor, the core of which is envisioned to become a mixed-use, pedestrian-oriented neighborhood.
- If casino operations have different peak hours due to the nature of their operations, those peak hours should also be analyzed along the Shiloh Road corridor.
- Establish a mechanism for the project to acquire land from individual property owners along the Shiloh Road corridor in order to accommodate the necessary

vehicle, bicycle, and pedestrian facilities needed to support the project within the public right of way.

- Determine the intersection modifications that the project will be responsible for constructing at Old Redwood Highway/Shiloh Road both under signalized and roundabout control options, including provisions to ensure convenient and safe access for pedestrians, bicyclists, and transit users. Confirm that these improvements will also be sufficient to accommodate traffic with the project under year 2040 conditions.
- Identify the infrastructure improvements necessary to maintain moderate-speed traffic flow that is compatible with non-auto modes, including arterial traffic calming strategies. Ensure that roadway design modifications do not encourage high vehicle speeds at any point along Shiloh Road between US 101 and the project site.
- Determine access and safety impacts to local streets and driveways on Shiloh Road near the project site and identify countermeasures that the project will implement to address these impacts.

Old Redwood Highway Corridor

- Analyze traffic operation and the project's contribution to traffic impacts at the Old Redwood Highway/US 101 interchange (near downtown Windsor).
- If an access to the project is to be established on Old Redwood Highway, determine the intersection geometry and control needed to both maintain acceptable traffic operation and ensure that adjacent intersections (including Old Redwood Highway/Shiloh Road) continue to function acceptably.
- Determine physical improvements to be made by the project that are needed to accommodate vehicle, pedestrian, bicycle, and transit modes along Old Redwood Highway within one-half mile in either direction of the proposed project's access point.

Vehicle Miles Traveled

- Determine the project's total increase in regional vehicle miles traveled (VMT) generated by both guests and employees, as well as the corresponding home-based VMT per employee performance metric.
- If subject to CEQA and in accordance with CEQA requirements, identify and implement strategies that will result in no net increase to total regional VMT, and that will allow the project to comply with employment VMT per employee significance thresholds.

Evacuation Routes

- Shiloh Road, East Shiloh Road, Old Redwood Highway and Highway 101 are all designated evacuation routes during an emergency event. The impact of casino customers and employees evacuating the project site at the same time as Town residents should be analyzed along the evacuation routes.

Transportation Demand Management

- Identify rigorous and comprehensive strategies that the project will implement to reduce auto-generated travel. Extensive Transportation Demand

Management (TDM) measures should be identified to address both employee and visitor travel, reducing local and regional impact to both traffic operation and VMT. Identify and implement measures that will maximize the use of transit, including both public transit and private buses/shuttles.

General Plan

- Project traffic impacts should be compared to the policies in the Windsor 2040 General Plan. The casino project was not a consideration when recommendations were developed for the General Plan. Shiloh Road, Old Redwood Highway and the Highway 101/Shiloh Road interchange were all analyzed for the General Plan and recommendations were developed absent this project as a major factor to be included in the analysis.

Land Use

- The town limits are immediately north of the project site, across Shiloh Road. Additionally, the properties to the west of the Project Site, across Old Redwood Highway are within the Town's sphere of influence and have therefore been assigned land use designations in the Town of Windsor General Plan. The Project Site is primarily accessed by Shiloh Road and Old Redwood Highway, portions of which are located wholly within the Town of Windsor. Potential environmental impacts that were not addressed in the Windsor General Plan Environmental Impact Report should be identified.
- The proposed project is outside and adjacent to the Town of Windsor Urban Growth Boundary. The Environmental Assessment/Tribal Environmental Impact Report should determine whether the proposed project could have growth-inducing impacts.
- The Town of Windsor General Plan land use diagram designates the properties to the north and west of the Project Site for Very Low Density Residential (three to six dwelling units per acre) development with Boulevard Mixed-Use (16 – 32 dwelling units per acre) to the west, fronting Shiloh Road. Additionally, the Town has adopted the Shiloh Road Vision Plan for the Shiloh Road Corridor west of the Project Site. The Shiloh Road Vision Plan envisions mixed use development that encourages walking and biking. The planning for the density and intensity of these land use designations and for Town infrastructure in the area was done with the assumption that the Project Site would continue to be used for agriculture. Impacts to the long-range vision of these planning documents should be analyzed.
- The land use designation for the Project Site in the Sonoma County General Plan is Land Intensive Agriculture, the stated purpose of which is to “enhance and protect lands best suited for permanent agricultural use and capable of relatively high production per acre of land.” Permitted land uses include keeping of livestock, indoor or outdoor crop production, daycare facilities, telecommunications facilities, and seasonal farmworker housing. Hotels, restaurants, and gaming facilities are not listed as permitted uses with this designation. Potential environmental impacts that were not addressed in the Sonoma County General Plan Environmental Impact Report should be identified.

- The Project Site is part of the Windsor/Larkfield/Santa Rosa Community Separator. The purpose of community separators is to maintain greenbelt areas around and between Sonoma County's cities, towns, and more densely developed communities. The Project Site is currently developed with vineyards, meeting the spirit of the community separator designation. Potential impacts to the Windsor/Larkfield/Santa Rosa Community Separator should be analyzed.

Public Services

- The NOP does not include specific information on which jurisdiction will be providing public services. Information should be provided regarding whether services will be coming from Sonoma County, the Town of Windsor, or elsewhere.
- An analysis of the impact to response times, staffing, and equipment needs for public safety services, including Fire, Police, and Medical should be included in the Environmental Assessment.

If you have questions or need additional information, please contact me: Patrick Streeter, Community Development Director, at pstreeter@townofwindsor.com or at (707) 838-5313.

Sincerely,



Patrick N. Streeter, AICP
Community Development Director

cc: Chad Broussard, Environmental Protection Specialist
Mark Linder, Interim Town Manager

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



Governor's Office of Planning & Research

June 27, 2022

Jun 27 2022

STATE CLEARINGHOUSE

SCH #: 2022050599
GTS #: 04-SON-2022-00676
GTS ID: 26607
Co/Rt/Pm: SON/101/26.98

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Department of the Interior
2800 Cottage Way Room W-2820
Sacramento, CA 95852

Re: Koi Nation of Northern California Shiloh Resort and Casino Project Notice of Preparation (NOP)

Dear Chad Broussard:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the May 2021 NOP.

Project Understanding

The proposed project includes the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site. The riparian areas of Pruitt Creek will be primarily avoided by the proposed development. The portions of the project site outside of the riparian area and building footprint would be landscaped with existing vineyard areas maintained around the perimeter of the site to the extent feasible. Water supply to serve the project is proposed through the use of on-site wells, and wastewater would be treated via a proposed on-site tertiary wastewater treatment plant. Access to the site may be provided through new driveways on Shiloh Road and Old Redwood Highway.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the Tribe.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance ([link](#)).
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.
- Clarification of the intensity of events/receptions to be held at the location and how the associated travel demand and VMT will be mitigated.

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Tribal Coordination

Caltrans recommends the project developer seek cultural sensitivity training from the Koi Nation of Northern California prior to the start of the project.

Lead Agency

As the Lead Agency, the Bureau of Indian Affairs is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is fluid and cursive, with a long horizontal stroke at the end.

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse



OFFICE OF THE COUNTY ADMINISTRATOR

COUNTY OF SONOMA

575 ADMINISTRATION DRIVE – ROOM 104A
SANTA ROSA, CALIFORNIA 95403-2888
TELEPHONE (707) 565-2431
FAX (707) 565-3778

SHERYL BRATTON
COUNTY ADMINISTRATOR

CHRISTINA RIVERA
ASSISTANT COUNTY ADMINISTRATOR

PETER BRULAND
DEPUTY COUNTY ADMINISTRATOR

BARBARA LEE
DEPUTY COUNTY ADMINISTRATOR

CHRISTEL QUERIJERO
DEPUTY COUNTY ADMINISTRATOR

June 27, 2022

Bureau of Indian Affairs, Pacific Region
Attn: Amy Dutschke, Regional Director
2800 Cottage Way
Sacramento, CA 95825

RE: Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report for the Koi Nation of Northern California Shiloh Resort and Casino Project

Director Dutschke,

In response to the Tribe's initial announcement of the subject project, the Sonoma County Board of Supervisors unanimously adopted a resolution opposing the proposed project in support of the five federally recognized Sonoma County Tribes, which have all formally expressed opposition to the subject project. The resolution is attached as **Attachment A, Sonoma County Board of Supervisors Resolution**.

On May 26, 2022, the County of Sonoma received the Notice of Preparation dated May 26, 2022 (NOP), for the Koi Nation of Northern California Shiloh Resort and Casino Project (Proposed Project). As proposed, the project conflicts with several goals and policies within the County's General Plan, including being contrary to community separator policies adopted by the voters of Sonoma County.¹ On June 14, 2022, the County of Sonoma formally requested an extension of the scoping period from 30 days to 90 days in addition to a BIA hosted scoping hearing and the preparation of a more rigorous Environmental Impact Statement as required by NEPA. This letter is attached as **Attachment B, County Response to BIA 6.14.2022**. On June 24, 2022, the County's request was denied by the BIA, citing the interest of efficiency and noting that the National Environmental Policy Act (NEPA) does not require a Notice of Preparation of scoping period at this stage of the process. The County of Sonoma respectfully disagrees with your decision and formally protests the denial and requests reconsideration.

The County has reviewed the NOP and comments on the environmental issues are presented below. It should be noted that the County's ability to comment meaningfully on the scope of the project is limited by the lack of a full project description. We look forward to reviewing a more complete and detailed description of the project issue areas including the following components:

1. **Wastewater Treatment:** The NOP states that wastewater would be treated via a proposed on-site tertiary wastewater treatment plant. The EA should include a detailed description of who will operate the wastewater treatment plant and what their qualifications will be. There should also be a description of an Operation & Maintenance Program to ensure the treatment plant is well maintained and that it operates correctly throughout the life of the project.

¹ <https://permitsonoma.org/regulationsandinitiatives/communityseparators>

The NOP states that the project would discharge tertiary treated effluent to Pruitt Creek during the winter months. The EA should clarify how the discharge will comply with water quality standards, the federal antidegradation rule, and if the project would comply with state discharge regulations for the North Coast Regional Water Quality Control Board or just EPA discharge regulations. If the project does not anticipate compliance with these regulations, the EA should provide a detailed analysis for the proposed season/volume of discharges and the potential impacts due to the discharges.

2. **Stormwater/Receiving Water Quality:** Sonoma Water owns a section of Pruitt Creek downstream of the project area. Sonoma Water is concerned about the potential impacts due to contributions of discharges from the project. The EA should include an analysis for potential stormwater impacts and mitigation measures to reduce an increase in peak runoff, comply with water quality standards and the federal antidegradation rule, and comply with mandated low impact development best management practices.
3. **Groundwater:** The project area is within the boundaries of the Santa Rosa Plain Groundwater Sustainability Agency (GSA). The BIA should provide notice to and require coordination with the GSA to help implement projects and management actions identified in the Santa Rosa Plain Groundwater Sustainability Plan, including a monitoring program, increased conservation strategies, groundwater recharge, water reuse, and other actions to support groundwater sustainability. In addition, the EA should include an analysis of the cumulative impacts on groundwater by developing a water balance analysis and evaluating project impacts to groundwater sustainability relative to groundwater levels, groundwater storage, groundwater quality, depletion of interconnected surface water, and land subsidence. This analysis is necessary to evaluate whether there is an adequate supply of groundwater for the project and that the project will not cause or contribute to a net deficit in aquifer storage or long-term lowering of groundwater levels.
4. **Water Efficiency/Conservation Measures:** The NOP states that recycled water generated by the proposed on-site wastewater treatment plant would be used to off-set potable water demands. The EA should specify that the project would implement best management practices for water use efficiency and conservation. The EA should include an analysis of wastewater treatment plant tertiary supply available to off-set potable demand in order to evaluate additional opportunities for potable off-set from implementation of on-site rainwater catchment and reuse.
5. **Traffic:** Since 2017, the County of Sonoma has been impacted by six federally declared disasters including three destructive wildfires. Safe and effective evacuation routes are critical to the County's Emergency Response Plans. A project of this size will have significant impacts on traffic and roads. To be optimally informative, the EA/TEIR should include a full traffic study. Additionally, the BIA should give notice of the NEPA process to CalFire, the Board of Forestry, and the California Department of Emergency Services, and FEMA.
6. **Noise:** To be optimally informative, the EA/TEIR should include noise impacts during construction and operation.
7. **Air quality, VMT, GHG:** To be optimally informative, the EA/TEIR should include analyze air quality impacts during construction and subsequent operation, including an analysis addressing Vehicle Miles Traveled / Greenhouse Gas (VMT/GHG) impacts. Mitigation to offset the increases in GHG due to the project should include a detailed analysis by a qualified consultant and comprehensive plan on how to address impacts through agreed upon mitigation measures. Additionally, the BIA should give notice of the pending project and NEPA process to the Bay Area Air Quality Management District which has jurisdiction over the site.
8. **Biological Resources:** To be optimally informative, the EA/TEIR should include an analysis of impacts on biological and natural resources including riparian corridors of Pruitt Creek, impacts to Congested headed hayfield tarweed, Burrowing owl, Western pond turtle and Steelhead and

include appropriate mitigation measures. The County encourages the use of proactive measures, such as best management practices (BMPs), surveys, construction windows, low impact development (LID) plans, testing and monitoring, to avoid, minimize and mitigate potentially significant environmental effects of the project. To clarify jurisdictional information, EA/TEIR should identify local, state and federal agencies consulted during the preparation of the EA/TEIR and any required permits and standards applicable to the project. To ensure the EA/TEIR provides an accurate picture of impacts, it should also analyze cumulative impacts associated with increased development both on and off of Tribal lands for reasonably anticipated future projects.

9. **Flood Risk:** The project should include identification of the flood plane and floodway in which the site is located and related risks.

Community input was solicited and all comments received by the County to date are included as **Attachment C, Community Input.**

Again, the County of Sonoma protests the denial of its request for an extension of time to submit comments on the NOP. The extension is necessary to permit the County to fully and meaningfully participate in the NEPA process. If you have any questions regarding these comments, which should be considered a partial list of the County's concerns with the NOP and NEPA process due to the insufficient time provided, please contact Intergovernmental Affairs Coordinator Marissa Montenegro at Marissa.montenegro@sonoma-county.org or 707-565-3771.

Sincerely,



Christina Rivera
Assistant County Administrator

cc:

Sonoma County Board of Supervisors
Sheryl Bratton, County Administrator
Jennifer Klein, Chief Deputy County Counsel
Chad Broussard, BIA Environmental Protection Specialist

Attachments:

[Attachment A, Sonoma County Board of Supervisors Resolution](#) Opposing Koi Nation of Northern California Shiloh Resort and Casino Project
[Attachment B, County Response to BIA 6.14.2022](#)
[Attachment C, Community Input](#)






CAO NOP Response to BIA 6.27.2022v4

Final Audit Report

2022-06-28

Created:	2022-06-27
By:	Marissa Montenegro (Marissa.Montenegro@sonoma-county.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAEXaeTyPTcsRFxUwoQqwylFRba3xOazna

"CAO NOP Response to BIA 6.27.2022v4" History

-  Document created by Marissa Montenegro (Marissa.Montenegro@sonoma-county.org)
2022-06-27 - 11:32:55 PM GMT- IP address: 209.77.204.154
-  Document emailed to Christina Rivera (Christina.rivera@sonoma-county.org) for signature
2022-06-27 - 11:33:30 PM GMT
-  Email viewed by Christina Rivera (Christina.rivera@sonoma-county.org)
2022-06-27 - 11:34:43 PM GMT- IP address: 172.58.88.152
-  Document e-signed by Christina Rivera (Christina.rivera@sonoma-county.org)
Signature Date: 2022-06-28 - 0:35:30 AM GMT - Time Source: server- IP address: 172.14.15.244
-  Agreement completed.
2022-06-28 - 0:35:30 AM GMT



County of Sonoma

State of California

THE WITHIN INSTRUMENT IS A
CORRECT COPY OF THE ORIGINAL
ON FILE IN THIS OFFICE

ATTEST: April 5, 2022
SHERYL BRATTON, Clerk/Secretary
BY *Noelle Francis*

Date: April 5, 2022

Item Number: 13

Resolution Number: 22-0121

☐ 4/5 Vote Required

**Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California,
Opposing the Establishment of a Casino By The Koi Nation, a Non-Sonoma County Tribe,
Within the County**

Whereas, the Sonoma County Board of Supervisors has consistently opposed the establishment of Nevada-style casino gaming in Sonoma County;

Whereas, within the geographic boundaries of the County of Sonoma, lies the historic and ancestral territory of five federally recognized Southern and Southwestern Pomo tribes: the Cloverdale Rancheria of Pomo Indians; the Dry Creek Rancheria Band of Pomo Indians; the Federated Indians of the Graton Rancheria, the Kashia Band of Pomo Indians of the Stewarts Point Reservation; and the Lytton Rancheria Band of Pomo Indians;

Whereas, within the geographic boundaries of Lake County, lies the historic and ancestral territory of seven federally recognized Southeastern Pomo tribes: Elem Indian Colony; Habematolel Pomo of Upper Lake; Big Valley Band of Pomo Indians; Scotts Valley Band of Pomo Indians; Robinson Rancheria; Koi Nation of Northern California (Lower Lake Rancheria); and Middletown Rancheria of Pomo Indians of California;

Whereas, in the 1950s and 1960s the federal government passed a series of laws including the California Rancheria Termination Acts, which among other things ended the federal government's relationship with, recognition of, and benefits to numerous tribes in California, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, several tribes have been restored to federal recognition through legislation or litigation, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and most recently the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, around 2005, after changing its name, the Koi Nation unsuccessfully sought to acquire a site for a Las Vegas-style casino outside of Lake County, near the Oakland International Airport; and in 2014 the Koi Nation unsuccessful sought to establish a reservation and casino on Mare Island in the City of Vallejo;

Whereas, in 2019, the United States District Court for the District of Columbia, issued a decision declaring that the Koi Nation, as a reaffirmed tribe, was an Indian tribe restored to federal recognition; see *The Koi Nation of Northern California v. United States Dept. of the Interior* (D.C. Dist. Ct, Jan. 2019) 361 F. Supp. 3d 14;

Whereas, in September 2021, the Koi Nation, through its LLC, Sonoma Rose, purchased a ± 68.60 acre parcel (Subject Land), located at 222 E. Shiloh Road, on the southeast corner of the intersection of Shiloh Road and Old Redwood Highway, in the unincorporated area of the County;

Whereas, Shiloh Ranch Regional Park is to the east, residential development is north and south, the Town of Windsor is to the north and northwest, and the Sonoma County Airport is to the southwest of the Subject Land which is largely agricultural;

Whereas, in September 2021, the Koi Nation submitted an application to the federal government requesting that the United States Department of the Interior accept the Subject Land into trust for casino gaming and resort purposes under Part 151 of Title 25 of the Federal Code of Regulations;

Whereas, Federal law requires that a tribe restored to federal recognition have a “significant historical connection” to the land on which it proposes to game, 25 C.F.R. 292.12(b);

Whereas, the Koi Nation intends to operate its own gaming facility on the Subject Lands

to the exclusion of Sonoma County tribes;

Whereas, the Board of Supervisors strongly opposes tribes from outside Sonoma County attempting to use their tribal status to place lands within the County in trust and/or to otherwise establish gaming operations within the County;

Whereas, the Board of Supervisors strongly opposes tribes that do not have a clear significant historical connection to a specific property, or do not have authority to exercise jurisdiction in Sonoma County, from taking such property into trust or using such trust property for gaming purposes;

Whereas, the Board of Supervisors continues to encourage Sonoma County tribes to establish boundaries to assist in the determination of trust applications and other tribal issues;

Whereas, the five federally recognized Sonoma County based tribes (Cloverdale Rancheria, Dry Creek Rancheria, Lytton Rancheria, Stewart's Point Rancheria, and the Federated Indians of the Graton Rancheria) each sent the Board of Supervisors a letter or tribal resolution expressing unanimous opposition to the Koi Nation's proposal that the Department of the Interior to accept the Subject Land into trust for gaming purposes due to the Koi Nation's lack of significant historical connection to the Subject Land;

Whereas, gaming projects have significant environmental impacts and other effects on a community, particularly in an area that is predominantly agricultural and residential; and the County's infrastructure may not be able to adequately accommodate the proposed facility and its accompanying traffic, water, wastewater or other impacts;

Whereas, the Board of Supervisors respects tribal sovereignty and takes seriously its government-to-government relationship with tribes, and has worked in good faith with Sonoma County tribes towards a variety of shared goals, including the mitigation of off-reservation impacts stemming from on-reservation development;

Whereas, the Board of Supervisors supports and joins with Sonoma County tribes in opposing the Koi Nation's efforts at obtaining trust lands and establishing a resort

casino in Sonoma County; and

Whereas, allowing a tribe without a significant historical connection to the Subject Land, the area in the vicinity of the Subject Land, or the County of Sonoma generally, sets a significant negative regional precedent:

Now, Therefore, Be It Resolved, that the Board of Supervisors opposes any tribe attempting to establish trust property, exercise jurisdiction, or establish a gaming facility within the historical territory of other tribes without those tribes' explicit permission and partnership and supports an interpretation by the Governor of California, National Indian Gaming Commission, Bureau of Indian Affairs, and Department of the Interior of existing compacts and federal law to that effect; and

Be It Further Resolved, that the Board of Supervisors opposes efforts by any tribe to take land into trust or operate a casino unless it can demonstrate, to the satisfaction of the County of Sonoma, the State of California, and the Department of the Interior, compelling and significant historical ties to the specific designated property at issue and the right to exercise jurisdiction over that land.

Supervisors:

Gorin: Aye

Rabbitt: Aye

Coursey: Aye

Hopkins: Aye

Gore: Aye

Ayes: 5

Noes: 0

Absent: 0

Abstain: 0

So Ordered.



OFFICE OF THE COUNTY ADMINISTRATOR

COUNTY OF SONOMA

575 ADMINISTRATION DRIVE – ROOM 104A
SANTA ROSA, CALIFORNIA 95403-2888
TELEPHONE (707) 565-2431
FAX (707) 565-3778

SHERYL BRATTON
COUNTY ADMINISTRATOR

CHRISTINA RIVERA
ASSISTANT COUNTY ADMINISTRATOR

PETER BRULAND
DEPUTY COUNTY ADMINISTRATOR

BARBARA LEE
DEPUTY COUNTY ADMINISTRATOR

CHRISTEL QUERIJERO
DEPUTY COUNTY ADMINISTRATOR

June 14, 2022

Bureau of Indian Affairs, Pacific Region
Attn: Amy Dutschke, Regional Director
2800 Cottage Way
Sacramento, CA 95825

RE: Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report for the Koi Nation of Northern California Shiloh Resort and Casino Project

Director Dutschke,

To adequately review and provide comments to your agency, the County of Sonoma urgently requests a public scoping session and 30-day extension of time to submit comments on the project. We request that public comment opportunities and scoping sessions be noticed in newspapers and media with local circulation, such as the *Press Democrat*. We request that public sessions be offered virtually or an in-person/virtual hybrid to mitigate Covid risk.

As a matter of procedural efficiency, the BIA should not move forward with NEPA review for the Koi Nation's application filed under the Part 151 process without first rendering a decision on the Koi Nation's application for a restored lands determination. The County received from all federally recognized southern and south-western Pomo tribes in Sonoma County letters or tribal resolutions opposing the Koi Nation's request to have land taken into trust near the City of Windsor. The County Board of Supervisors passed a resolution on April 2, 2022 opposing establishment of the project as proposed by the Koi Nation, a non-Sonoma County tribe.

On May 26, 2022, the County of Sonoma received the Notice of Preparation (NOP), for the Koi Nation of Northern California Shiloh Resort and Casino Project (Proposed Project). The Proposed Project is to be built outside of, but contiguous to, the Town of Windsor. The project site is bordered by Shiloh Road and residential parcels to the north, Old Redwood Highway and residential parcels to the west, and agricultural and commercial parcels in unincorporated Sonoma County to the south and east. According to the NOP, the Proposed Project includes the acquisition of land in trust for gaming, the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site.

Among the County's concerns are that this is a large gaming and resort development in a wild-fire prone and environmentally sensitive area, with poor alternative access routes, that is proximate to residential development and park and agricultural land, in addition to being located within voter approved community separator lands. The BIA should prepare a thorough Environmental Impact Statement for this project under NEPA, with full public noticing, vetting, and participation.

The County has several questions regarding the 'joint' environmental document. The NOP describes the document to be prepared as a joint Environmental Assessment, and a tribal Environmental Impact Report. Please identify the standards applicable to preparation of the *tribal EIR* and, if the standards do not exist in current federal or state law, provide a copy of the standards to the County of Sonoma. The subject land is not currently in trust, and there is no intergovernmental agreement between the County of Sonoma and the Koi Nation related to environmental review or mitigation, nor is there a Tribal-State compact between the Koi Nation and the State of California that would address tribal environmental review. We note that where an EIS is required under NEPA, it must be prepared, regardless of whether a tribal EIR is also prepared.

The County intends to supplement this comment letter with additional comments on the NOP/scoping for the project to the extent feasible during the limited time provided for comment. The County appreciates the opportunity to provide comment on the proposed project and hopes that your agency meaningfully considers the requests in this letter. We also look forward to a dialogue with your agency and the tribe. Please contact Intergovernmental Affairs Coordinator Marissa Montenegro at Marissa.montenegro@sonoma-county.org or 707-565-3771 if additional time for comment will be provided or if you have any questions about this letter.

Sincerely,



SHERYL BRATTON
County Administrator

From: [Joan Weir](#)
To: [TribalAffairs](#)
Subject: Koi Tribal Casino
Date: Wednesday, June 8, 2022 6:13:55 PM

EXTERNAL

To whom it may concern I'm a resident of Santa Rosa and am responding to Sonoma County's request for comments regarding the potential for a new Casino to be located near the town of Windsor. I'm opposed to yet another casino being built when we already have 3 casinos within 20 miles of each other plus more casinos within an hour's drive from Santa Rosa.

I recently drove to the proposed Koi site. Placing a hotel & Casino in this area would ruin the nurturing, tranquil quality of the area for ever.

Please reject the Koi Hotel & Casino proposal.

Sincerely

Joan

Sent from Joan Weir
2045 Orchard St.
Santa Rosa, CA 95404
415-845-7749
divinelygreen@icloud.com

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [landmark](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Thursday, June 9, 2022 9:20:12 PM

EXTERNAL

If you can guarantee the winnings payouts to exceed graton casino who carry a history of greed on pay table percentage pay outs to be discusting discusting growing with the people is whats needed to be top dog higher payouts be fair to the people to kiss graton good by you would be welcome working for with ,together whith honor peace.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [Lillian Fonseca](#)
To: [TribalAffairs](#)
Subject: New casino site in Windsor
Date: Friday, June 10, 2022 2:08:08 PM

EXTERNAL

As a resident of Windsor for decades I have personally lived through and witnessed the horrors of large wildfires, severe drought and fear of earthquakes. When evacuation became mandatory due to wildfire danger I was stuck in the major traffic that clogged our streets and roads. I can only imagine the chaos if there is the additional major increase of traffic that the planned facilities would bring into our town. In addition, the increased water consumption, creation of more air pollution and garbage, plus having constant traffic to and from casino would be a real hardship to local community members.

It pains me greatly to drive down Shiloh and Old Redwood Highway knowing that the beautiful vineyards and peoples' homes currently located there may become things of the past.

My spirit is saddened by the potential loss of not only scenic beauty, but of the impact that this construction will have on local wildlife and the habitats that are located on the property.

Windsor is known as a family friendly community, a good place to raise a family, a peaceful town that is not crowded by outside intrusions— my hope is that this project can find a more appropriate location.

Please stay out of Windsor.

Lillian Fonseca

Sent from my iPhone

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

From: kst@sonic.net
To: [TribalAffairs](#)
Subject: Koi casino resort proposal on Shiloh Road
Date: Sunday, June 12, 2022 3:25:13 PM

EXTERNAL

To: Tribal affairs, Sonoma County

Please REJECT this proposal for the following reasons: harmful impacts include -

Wrong location surrounded by residential neighborhoods: the area cannot tolerate a commercial operation with activity 24 hours a day located across the street from two important parks, Esposti and Shiloh Regional Park - the traffic, noise, public safety risk from intoxicated drivers. THERE IS NO OTHER LOCATION IN NORTHERN CALIFORNIA WHERE A CASINO RESORT IS BUILT IN A LOCATION SURROUNDED BY ESTABLISHED RESIDENTIAL NEIGHBORHOODS AND ELEMENTARY SCHOOLS NEARBY. THIS IS A FAMILY AREA, AND NOT ZONED FOR COMMERCIAL USE. The other casinos are built in commercial zoned areas or rural/ remote. The intermix of casino traffic with residential neighborhood traffic should not be allowed.

The Harmful Impacts include:

traffic congestion and gridlock, impaired evacuation routes in case of wildfire, limited water resources in Sonoma County, public safety risks from intoxicated visitors and criminal activity that is coincident with increased visitor traffic, noise, loss of scenic corridor, degradation of scenic value in area for special athletic events along Shiloh Road and Faught Road. The five local tribes oppose this because their economies will be adversely impacted; River Rock casino has been adversely impacted by Graton Rancheria. A third casino only 15 miles away from either one of these will have a significant adverse impact.

The wildfire risk will increase with loss of green belt space and valuable vineyard as defensible space for the adjacent neighborhoods. Loss of Riparian corridor, Scenic corridor, and valley oak habitat. Loss of flood plain acreage needed for recharging ground water. Riparian corridor for management of flood water when rains return.

The harmful impact of casino resort traffic, noise, and increased number of visitors to the area will degrade the enjoyment of Esposti Park across the street and Shiloh Regional Park.

This location cannot accomodate a commercial operation - this parcel lies in the middle of residential neighborhoods, and the traffic congestion will stretch from Windsor to Santa Rosa, along Old Redwood Highway, and involve Faught Road, Airport Bl, River Road and Mark West Springs Road, Pleasant Avenue.

Please study these harmful impacts carefully, and request all agencies respond - Water, Transportation, Emergency Response, CalFire, local Fire Departments, Sheriff, Calif Highway Patrol, Windsor Police, Water and Septic, County Planning Department, Sonoma County airport - this location lies in a sensitive area for transportation safety for airline flights.

Thank you for adding these comments to the Shiloh Casino file.
C Belden

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From: tkyrk@aol.com
To: [TribalAffairs](#)
Subject: Against This Casino!
Date: Monday, June 13, 2022 12:59:02 PM

EXTERNAL

Where will the water come from? Who will pay to widen the road? What about wildfire evacuations?

We will need more police and EMT.

We DON'T need another casino.

No, no, no!

Thank you.

[Sent from the all new AOL app for Android](#)

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From: [louisealderon338](#)
To: [TribalAffairs](#)
Subject: KOI CASINO
Date: Monday, June 13, 2022 1:54:44 PM

EXTERNAL

I am opposed to the proposed casino at its present anticipated location. It would be adjacent to a public park and a community of houses on the outskirts of Windsor. The traffic generated by the casino can not be supported by the roads surrounding it. The traffic generated by the Tubbs and Kincaid fires was an absolute nightmare trying to exit Windsor. We have enough casinos but not enough open space that generates and encourages natural habitat and a family community.

Louise Calderon, 338 Winemaker Way, Windsor

Sent from my Verizon, Samsung Galaxy Tablet

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From: [Mary-Frances Makichen](#)
To: [TribalAffairs](#)
Subject: No Casino in Windsor
Date: Monday, June 13, 2022 5:38:48 PM

EXTERNAL

To Whom It May Concern,

As a resident of Windsor I can't tell you how much I am an opposition to the Koi casino being built here.

First, why on earth would anyone think it's a good idea to build a casino across from residential housing?

Secondly, it took some residents 45 minutes or longer to be able to get to the freeway during wildfire evacuation. You would be adding more people and cars and risking more lives especially of those who live in Windsor when evacuation's are necessary. Is the casino worth the life of residents?

Thirdly, my understanding is that the other tribes are staunchly against this. We already have two casinos in Sonoma County. That is sufficient we do not need another one.

I don't know whether this is true or not but I have been told that this is the third place they've tried to build this casino the other two places fought them off. Why are we not doing more to fight this off?

Mary-Frances Makichen
Windsor resident

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From: [Jet & Scott Engel](#)
To: [TribalAffairs](#)
Subject: casino
Date: Monday, June 27, 2022 8:59:23 AM

EXTERNAL

Please,
Consider these factors when reviewing plans to build a casino in the Shiloh area:
Environmental impact: use of water, energy, traffic in rural area.
Fire Safety and evacuation: The area has been affected by two large wild-fires in the past 5 years.
Casino saturation: Sonoma County has two large casinos. Is there a market for a third?
Tribal home land: I understand that the Koi Nation does not have ancestral history in Sonoma County.
Thank you for your time.
Sincerely,
Jeannette Rose DuBay Engel

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From: [Heather Cullen](#)
To: [TribalAffairs](#)
Subject: casinos
Date: Monday, June 27, 2022 8:59:27 AM

EXTERNAL

No casinos in residential areas PLEASE. We don't want it or all the negativity that comes from it.

cheers,

Heather Cullen, 707-838-3341


Windsor Performing Arts Academy, Founder & Director

Odyssey of the Mind Coach: Windsor High, Windsor Middle, and Calicalmecac

Public Art Commissioner for Town of Windsor

Are you a victim of human trafficking? Text "BeFree" to 233733 or
help@humantraffickinghotline.org

"We can choose to throw stones, stumble on them, climb over them, or build with them."

"Competing and Comparing with others is Impairing, make every day Better Than Yesterday, personally!" 

Visit Heather Cullen's website <http://www.windsorperformingarts.net/>

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Does a Casino Belong Here?

We moved to Sonoma County after 45 years in Hawaii. We purchased seven acres and built our home here in 2012. After several years of evaluating locations, we chose this area for its beauty, safety and feeling of community.

We are very concerned and disturbed by the proposed Koi Casino Site which is located at the bottom of our hill in a residential area. Please take a moment to scan the attached photos and map highlighting the inappropriateness of this proposed location.

We are particularly concerned about:

--Potential harm and safety to families; potential loss of life

--Fires—we have been severely impacted with fires in 2017, 2018, 2019, and 2020; we have had to evacuate multiple times—each time has been a dangerous and frightening experience due to the difficulty in egress and ingress in this area

--Lack of water—many wells in our area have gone dry; with drought expected to worsen, water is a huge concern

--Crime—facts show that theft, vandalism, drugs and prostitution significantly increase in and around casinos—they are never located in a residential area

--Environmental impact—to include the abundant wildlife; the removal of vineyards which have served as our firebreak, water and sewer

Our ask is that you contact The Bureau of Indian Affairs at the following address and share with them the inappropriateness of this proposed location—and as such, this property should not move from fee to trust.

Darryl La Counte, Director of the Bureau; Bryan Newland, Assistant Secretary
Bureau of Indian Affairs
Depart of the Interior
1849 C Street, N.W. MS-4606
Washington, D. C. 20240
Phone: (202)208-5116

We appreciate your attention in this matter and sincerely hope that you and your fellow state, local and community leaders will do everything in your power to change the location of this proposed Casino site to a non-residential location.

Thank you,

Judith and John Coppedge

Does a Casino Belong Here?



ESPOSTI PARK-E. Shiloh Rd.

- 10 acres
- baseball, soccer fields
- little league playing fields
- family picnic areas



OAK PARK NEIGHBORHOOD-E. Shiloh Rd.

- single family homes
- approx. 75 homes
- \$740-\$1.35M price range

MAYACAMA COUNTRY CLUB and SHILOH ESTATES-E. Shiloh and Faught Rds.

- private Country Club
- Jack Nicklaus golf course
- 95+ single family, multi-million dollar homes



SHILOH RANCH REGIONAL PARK-Faught Rd.

- 850 acres
- hiking trails, creeks & ponds
- horseback riding trails
- family picnic areas



FIRE DANGER—LOCATION SHILOH RD AT FAUGHT RD

DOES A CASINO BELONG HERE?



TUBBS FIRE-2017

- deaths—22; size—36,800 acres
- buildings destroyed—5,640
- size—36,800 acres
- mandatory evacuations; loss of power, water and gas

KINCADE FIRE-2018-19

- size—77,800 acres
- buildings destroyed—374; 90,000 structures threatened
- mandatory evacuations; loss of power, water and gas

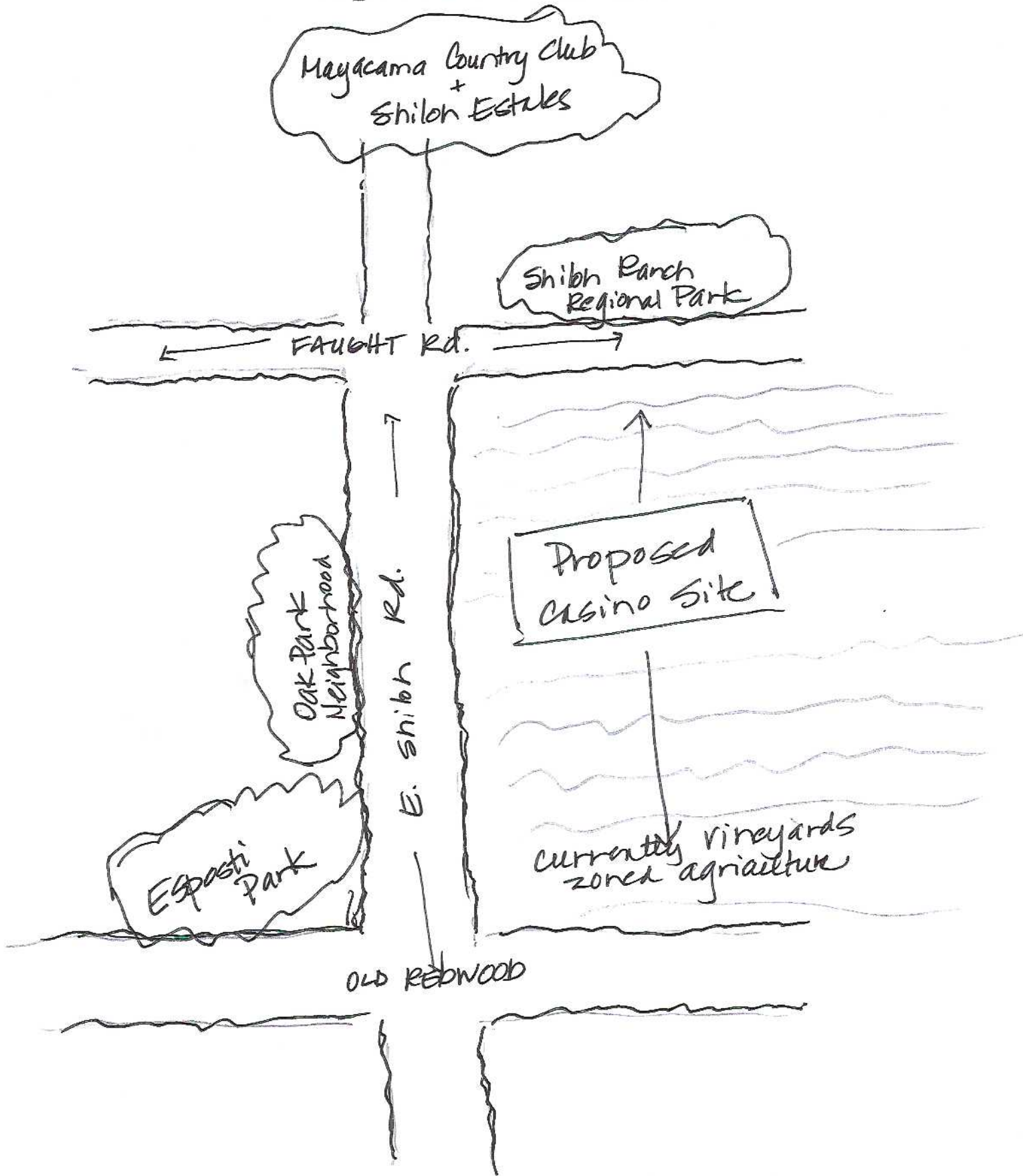
WALBRIDGE FIRE-2020

- deaths—6; -size—363,200 acres
- buildings destroyed—1,490
- mandatory evacuations; loss of power, water and gas

GLASS FIRE—2020

- size—67,500 acres
- buildings destroyed—1,555
- mandatory evacuations; loss of power, water and gas

Proposed Casino Site



From: [Gabriel Greene](#)
To: [TribalAffairs](#)
Subject: I oppose the Windsor Casino
Date: Monday, June 27, 2022 8:59:24 AM

EXTERNAL

I strongly oppose a casino in Windsor. I live in Windsor not far from the proposed location and I am concerned about the wildfire risk and drought situation. We already have enough casinos and I feel this will negatively impact the quality of life in Windsor.

Sincerely

Gabriel Greene
707 Willowood Way
Windsor

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From: [l.caruso](#)
To: chad.broussard@bia.gov; [TribalAffairs](#)
Subject: Koi Casino
Date: Monday, June 27, 2022 8:59:22 AM

EXTERNAL

Please. NO CASINO at Old Redwood Hwy and Shiloh Rd in Windsor/Santa Rosa. This is a terrible, irresponsible idea for many reasons including the following:

- Loss of a large fire break.
- In the event of an evacuation this would add a tremendous amount of traffic to the already congested route.
- Way too close to several residential areas.
- Negative environmental impact from increased traffic and huge amounts of water used by this monstrosity.

I've had the unpleasant experience of being evacuated from my home due to fire in this area and the traffic was incredibly bad. Our feelings about adding extra traffic are no joke. We all still panic when we smell smoke.

Please do the right thing and find a more suitable location for this casino. Lake County makes more sense given this tribes history.

Letitia Caruso
Windsor CA

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From: [Robert Brink](#)
To: [TribalAffairs](#)
Subject: Casino at Old Red Hwy and Shiloh
Date: Tuesday, June 14, 2022 1:49:31 PM

EXTERNAL

This is to affirm that my wife and I, as well as every other person living in this area to whom we have spoken, are vehemently opposed to a casino at the proposed site. Not only is a third casino in Sonoma County a bad idea in its own right, locating it at the junction of Old Redwood Hwy and Shiloh is a terrible idea on many grounds.

The existence of nearby schools, churches and stable residential communities makes the location a supremely poor choice for obvious reasons. Even if the casino weren't popular enough to be financially profitable, the traffic it would create would adversely impact day and night travel and impose an intolerable burden in the event of another mandatory evacuation. That the area is not zoned for such an enterprise cannot be ignored, nor can the obvious impact it would have on already limited water supplies. Having a 24 hour a day enterprise right next to a residential area with churches and schools is purely insane for reasons of noise, light pollution at night, the risk of drug peddling and prostitution, and limited infrastructure.

That the Koi Nation has no significant connection to this land makes the proposal ludicrous and offensive to any coherent human being with normal sensibilities.

Allowing this travesty to happen will permanently disgrace any public official who supports it.

Do not allow this insane proposal to gain momentum.

Thank you,
Robert Brink, MD

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From: [sfbusdrr](#)
To: [TribalAffairs](#)
Subject: Casino near windsor
Date: Tuesday, June 14, 2022 6:16:05 PM

EXTERNAL

Hi. I am a Windsor resident and I just wanted to drop you a note in support of the casino being proposed near Windsor. It's time we stop telling Native Americans what they can and cannot do with their land.

Sincerely, Kim Byman

Sent from my Metro By T-Mobile 4G LTE Android Device

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From: [Steve Plamann](#)
To: [TribalAffairs](#)
Subject: Casino Opposition - Our Community Matters
Date: Tuesday, June 14, 2022 10:10:54 PM

EXTERNAL

To Whom it May Concern,

To put a gambling casino next to long established neighborhoods and within a mile of an elementary school, while destroying a vineyard at the same time, makes this an unfit project for our community.

Steven Plamann
112 Anna Drive
Windsor, CA 95492

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From: [Lynn Darst](#)
To: [TribalAffairs](#)
Subject: CASINO OPPOSITION
Date: Tuesday, June 14, 2022 12:25:32 PM

EXTERNAL

As a Sonoma County resident, I vehemently oppose a Casino Resort on East Shiloh Road. This is an inappropriate location for a 24 hour business that includes a 200 room hotel, six restaurants, conference center, spa and a casino. The 68 acre parcel is surrounded by a number of quiet neighborhoods, churches, schools, parks and a community who enjoys the outdoor activities.

I strongly urge that the Sonoma County Board of Supervisors support our concerns:

... FIRE SAFETY & HUMAN LIFE: We have a history of deadly fires. The evacuation of an additional 20,000 plus, casino customers is a recipe for disaster. There is no safe way of evacuating this amount of people from this particular area, without increasing the risk of death.

...WATER SHORTAGE/DROUGHT: Sonoma County residents are being asked to conserve water. Many of us are taking fewer showers, not watering our lawns or flushing our toilets often. Lack of water for a business that invites over 20,000 people a day puts too great a water burden on the people in the area.

...STAFFING CONCERNS: With the anticipated hiring of 1100 casino employees, combined with the extreme staffing shortages through the county's there would be ass devastation for existing businesses, Local business are unable to fill their staffing needs and as a result have either been forced to close or alter their hours of operation. We, as consumers, are the recipients. Don't let this issue become a detriment to our community.

There are many concerns that go well beyond the above that include increased crime drunk driving increase of noise, lighting and traffic, devaluation of our property. The loss of the fire break of the vineyards would be detrimental as they saved homes during the last fires.

This is the WRONG LOCATION for a business operation of this size.

Sincerely,

Lynn R. Darst

Sent from my I-Pad

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From: [stefani.madarus](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Tuesday, June 14, 2022 12:54:11 PM

EXTERNAL

Hello, I live on a little farm off of Pleasant Avenue in Windsor, Ca. The Casino will be less than 5 minutes from my home. I am very concerned about this Casino project going forward because of the continuous high fire risks for this area. If I were to have to evacuate my family and animals, I have only two ways out, which happens to be towards the Casino in either direct. If there is excess traffic from Casino goers, it could very well put my family and animals lives at risk. Windsor is simply not a big enough city to accommodate a Casino.

Another huge concern I have is that I live off of a little well on my property. We do not have the water levels we used to, we are in a severe drought and it does not seem to be getting better. I am very concerned my well will not be able to keep up with my family's needs (it's just me and my husband, and we have our first child on the way). We have already down sized our farm due to the shortage of water and skyrocketing grass hay prices. Which was heartbreaking for us.

I care about my community, and you should too. Please do not allow this Casino to be built in beautiful, small town Windsor. I know money is the "end all, be all", and your hands could very well be tied, but money and power is not worth the families that will be inevitably affected.

-Stefani Madarus, Windsor Resident

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From: [Midori Verity](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Tuesday, June 14, 2022 2:35:44 PM

EXTERNAL

To Whom This May Concern,

I am 100% against a casino going in the Larkfield neighborhood.

Here are just a few reasons:

- This is a residential area
- We have been incredibly stressed with the fires, pandemic, and now a potential casino in our backyard
- Traffic would be a nightmare
- Water shortages are already an issue
- Our property values will be dramatically decreased, despite many home improvements

We have two casinos within a 25 mile radius. Thankfully, the first two are not in neighborhoods. Three casinos would destroy the charm and value of Sonoma County.

This makes no sense and leads me to question my support of the Indian community.

--

Midori Verity, CEO



FueltoFire.co

707-653-0002

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From: [Maureen OBrien](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Tuesday, June 14, 2022 4:33:47 PM

EXTERNAL

The casino is a ridiculous idea. We do not have enough water for a hotel and all the extra people. Our roads cannot support more traffic. I cannot get out of my street now never mind with more cars and buses bringing gamblers. What about access to Shiloh park and the animals plus the carbon emissions from the cars. No thanks to having another casino
Maureen OBrien

Sent from my iPhone

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From: [Marilyn Simeone](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Tuesday, June 14, 2022 11:11:52 PM

EXTERNAL

I am completely against a casino being built on Shiloh! This area is a residential family area with schools and churches nearby! With wildfire risk always present a casino built on Shiloh would COMPLETELY plug the exit of residents on Old Redwood Hwy. Water availability is another very important reason why a casino on Shiloh is absolutely out of the question! It would definitely jeopardize the welfare and safety of so many people in the area! These are just a few of the MANY reasons why we cannot entertain the possibility of a casino in this family oriented residential area!

Sincerely,
Marilyn Simeone
Manka Circle

Sent from Lynns iphone

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From: vipo1956@yahoo.com
To: [TribalAffairs](#)
Subject: Comment Proposed Casino in Windsor
Date: Tuesday, June 14, 2022 7:12:45 PM

EXTERNAL

Dear Committee Members,

I am writing to express my opposition to the proposed casino to be located near Windsor.

While my reasons are many, I will narrow this down to the top three concerns which I have:

1. Public Safety. This is particularly concerning as someone who had to evacuate during the Kincade Fire several years ago. With the addition of more much-needed affordable housing units, there would be even more of the general population needing to be served by police and fire, as well as many more people to evacuate in the event of an emergency.
2. Infrastructure Roads. Closely tied to the item above is that there is not sufficient infrastructure, particularly roads, to handle the type of additional traffic which would result from the casino. Further, there is not enough room to widen the existing roads as the proposed site is surrounded by private property.
3. Drought and Water Rationing. We are in a severe drought and have been requested to ration water for household use. Any additional use of this precious resource should be saved for people who live and work in Sonoma County, including proposed much-needed affordable housing already in progress.

Please feel free to contact me with any questions.

Sincerely,

Victoria Osten
(707) 239-0053

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From: [Stefan and Kathy](#)
To: [TribalAffairs](#); chad.broussard@bia.gov
Subject: Concerns About Proposed KOI Casino in Santa Rosa
Date: Tuesday, June 14, 2022 2:41:56 PM

EXTERNAL

Dear Representative,

I am deeply concerned about the proposed KOI Casino to be built off of Shiloh Road in Santa Rosa. I am a 20+ years resident of the neighborhood, living only 1/2 mile from the proposed site.

My concerns are as follows:

- **Increase in traffic** - after having lived through the recent fires that forced us to evacuate our home, I am concerned about the traffic jam such a facility would cause during a mass evacuation. As I write this, there are new apartments in the process of being built just adjacent to the proposed site on Shiloh Road that will also be impacting the traffic in the intersection of Old Redwood and Shiloh. Please have an in-depth traffic study performed prior to making a decision.
- **Increase in crime** - the area surrounding the proposed project is residential. Families with all ages of children live within yards from the proposed site. Please look closely at how casinos affect the safety of neighborhoods so close to them. Look at the statistics of increase in drunk driving incidences, home invasions, drug use, etc.. The type of people drawn to casinos, the alcohol/drug use, and prostitution would be just outside our front doors. Would you want to raise your children across the street from a casino? How will the casino affect the local Shiloh and Eposti parks? These neighborhood parks are right outside the proposed casino's doors, visited by hundreds of families every day.
- **Noise** - casinos operate 24 hours a day. Lights, music, cars all creating noise that will affect our quiet neighborhood. Please look closely to how a casino will negatively impact the quiet neighborhoods surrounding the project.
- **Water Conservation** - we are all conserving water. How will a project of this magnitude affect our water tables? As I mentioned before, already we have the construction of new homes/apartments in the surrounding area that will require a share of the water. How is a project of this size sustainable?

Please research carefully. I, and my neighbors, are extremely concerned and are asking for your thoughtful consideration and diligent research to help prevent this project from moving forward.

Thank you,

Kathy Parnay

190 Barrio way

Windsor, CA

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From: [bill mccormick](#)
To: [TribalAffairs](#)
Subject: Extreme Opposition to Shiloh Rd Casino, Sonoma County, CA
Date: Tuesday, June 14, 2022 1:16:00 PM

EXTERNAL

As a long-term citizen of Sonoma County and nearby property owner, I cannot express strongly enough my opposition to the proposed casino on Shiloh Road in Sonoma County, California. Citizens of the County have a right to peaceful existence based on where they have chosen to live and in accordance with established local government rules and regulations. NO CITIZEN, of any ethnic origin, has the right to impinge on the rights of others and be able to build a development that is inconsistent with the established laws and regulations. The casino project is in direct opposition to established development and environmental guidelines on so many levels. This project, if allowed to move forward, will have irreparable damage to the local and regional environment as well as detrimental impacts to the neighbors.

Below is a outline of negative issues associated with this proposed casino project and points of extreme opposition:

- Reservation Shopping, especially by a tribe that as no ancestral roots to Sonoma County
- Proximity to residential neighborhoods and decreased property values for those that have already been established in this area
- Increased wildfire risk and evacuation congestion
- Increase traffic, noise and pollution, including light pollution from the casino
- Increased crime associated with casino clientele
- Water availability and additions to drought conditions
- Non-compliant construction practices, safety concerns
- Non-compliant environmental standards from local and state codes for indian developments
- Adverse change from agricultural to commercial
- Extreme decrease in quality of life for neighbors /citizens
- Decrease in public safety due to type of development and increased transient population of casino patrons
- Existing established casino operations and competition on either side of the proposed project which would decrease the potential success of a third Sonoma County casino and the uncertainties of property upkeep in that situation

This is just a short highlighted list of detrimental effects of a casino project in this part of Sonoma County. It is wrong to promote the monopolized success of just a few people, at the expense of the masses and to those tribes that have rightful and historical ties to Sonoma County.

Please feel free to forward my highlighted concerns on to the BIA as appropriate. If needed, I am willing to expand and present my opinions to any appropriate personnel of the BIA.

Sincerely

William McCormick (707.953.1837)

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From: jscoppedge@att.net
To: [TribalAffairs](#)
Subject: FW: Proposed Casino Site Location (Shiloh Road)-Residential neighborhood-Environmental Assessment/Tribal Environmental Impact Report
Date: Tuesday, June 14, 2022 4:25:58 PM
Attachments: [Does a Casino Belong Here--4-22.pdf](#)

EXTERNAL

Hello Sonoma County Representatives—

As you gather information in preparation of an Environmental Assessment/Tribal Environmental Impact Report, please take a few moments to review the attached pertaining to the Proposed Casino Site on Shiloh Road., Windsor, Sonoma County. Our opposition is to the location of this Casino—in the middle of a residential neighborhood.

Thank you for your commitment to the safety and well-being of your fellow residents and neighbors.

Judith and John Coppedge

Email: jscoppedge@att.net

Mobile: 707-280-6876

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From: abendclaudia@gmail.com
To: [TribalAffairs](#)
Subject: Fwd: Proposed casino in larkfield mark west area
Date: Tuesday, June 14, 2022 11:50:45 PM

EXTERNAL

Sent from my iPhone

Begin forwarded message:

From: abendclaudia@gmail.com
Date: June 14, 2022 at 23:28:29 PDT
To: tribalaffairs@sonoma-county.org
Subject: Proposed casino in larkfield mark west area

This is a horrible area for a Casio project! The area is very much residential with family parks,regional wildlife parks ,schools and churches . Our area is a real log jam to evacuate for fires and disasters let alone to accommodate a big casino operation with so much increase of daily traffic . This kind of operation would negatively impact our way of life and day to day regular activities. Water issues are already a worry for those in this area that depend on private wells ... to add a new population of a casino operation , hotel and conference center is so unfair to this community! The climate change and water shortage is enough to worry and plan for ! The koi nation needs to take their ideas and plan for a casino ect back to lake county area where their true roots are ... tell them to buy and rebuild the knocti harbor area ... that is an excellent area for a project and operation of this kind and it has a successfull history ! Please don't let this happen to our community area !!! Thank you Claudia Abend . 5925 old redwood hwy Santa Rosa ca 95503 .. across the street from this proposed mess !!!

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From: abendclaudia@gmail.com
To: [TribalAffairs](#)
Subject: Info to come
Date: Tuesday, June 14, 2022 11:48:12 PM

EXTERNAL

Sent from my iPhone

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From: [Greg Heath](#)
To: [TribalAffairs](#)
Subject: Koi Casino
Date: Tuesday, June 14, 2022 4:33:17 PM

EXTERNAL

We are writing to you to express our concerns about the proposed Koi Casino on Shiloh Rd. It would be a huge complex that would ruin the bucolic environment of our neighborhood and the whole area. The proposed site is surrounded by residential neighborhoods, churches, schools and parks. We retired to this neighborhood because of the beauty and peacefulness. We are shocked and appalled that it would even be considered as an appropriate site for a casino complex. There are limited resources in the neighborhood already. We were on mandatory water restrictions last summer and it will likely be the same this summer because of the continuing drought. We are also concerned about evacuations in the case of wildfires. Even the 101 was backed up when we had our last evacuation so it would be a disaster with all the additional people trying to evacuate the area. There surely are more appropriate sites for the Koi Tribe to build a casino.

Thank you for reading this and considering our legitimate concerns.

Greg and Janine Heath

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From: [Mike Gmail](#)
To: [TribalAffairs](#)
Subject: Koi Nation Casino
Date: Tuesday, June 14, 2022 12:51:19 PM

EXTERNAL

Greetings,

I am writing to you today in opposition of the proposed Casino on Shiloh road. As a nearby resident, I cannot understand how anyone would suggest a mega-casino/hotel in a residential neighborhood with an elementary school, regional parks and churches all within eyesight. I am not against casinos and very much support tribes having access to this important revenue stream, it just does not sense at this proposed site.

My major areas of concern beyond suitability given the residential/agricultural setting is wildfire risk. In the last five years, we have been evacuated twice and the last fire burned part of my property...with a single point of entrance and egress to my home abutting a mega-casino and hotel, the evacuation difficulties are a serious hazard that will not be able to be mitigated.

Water is also a concern...where will the water come from to serve this new business when everyone is already under severe rationing?

I believe the County should help the tribe find a more suitable location. The Gratin casino was built in a commercial/industrial area which makes sense. Even the site immediately off 101 on Shiloh Road which has had a development sign for the last five years would be a much better site than what is being proposed.

I hope the EIR process will find that this site scores very low as compared to alternatives and the project should not be allowed to continue.

Thank you,
Mike Carlson
6285 Shiloh Ridge

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From: [Josh Ratiani \(Shiloh Neighborhood\)](#)
To: chad.broussard@bia.gov; [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Tuesday, June 14, 2022 12:36:56 PM

EXTERNAL

I am writing in regards to the Koi Nation Shiloh Resort Environmental Impact study. **I am the Pastor of Shiloh Neighborhood Church**, directly across Old Redwood Highway from the property being studied. I also have lived in the house on the property for the past 11 years, just across the street from the current vineyard.

I am concerned about a number of environmental impacts should the property containing the current vineyard and creek be developed.

First, the vineyard serves as a **fire break**. In 2017, the Tubbs Fire came right up to Shiloh Regional Park, across from the vineyard (pictures attached, taken from our church). In 2019, the Kincade fire stopped within a quarter mile of the vineyard. Needing to evacuate hotel and casino guests in future fires will also create traffic jams. The photo below shows the Tubbs Fire behind the vineyard. Another photo is attached showing the following day, with the fire burning down through the park.



Second, I am concerned about the **impacts on wildlife**. I have been a part of Shiloh Neighborhood Church for 28 years, and have observed countless wildlife species traversing through the vineyard and Pruitt Creek, or flying overhead.

I have a wildlife trail camera at the church property, and have captured images and videos of coyotes, skunks, raccoons, gray foxes, opossums, and jack rabbits traveling through the area. Additionally, we've observed Great Horned Owls, Red Tail Hawks, Blue Herons, Canadian

Geese, bats, and many small birds flying over the vineyard. There is a **de facto wildlife corridor** from Shiloh Regional Park all the way to Highway 101, which passes through the vineyard and our church property. I regularly watch coyotes, foxes, and jackrabbits cross the road from my front yard into the vineyard at dusk. While the vineyard is not the same as wild land, it is easily traversed by these creatures. I hear and see the birds and owls fly from the Regional Park to land in our trees. The added noise and light pollution will undoubtedly affect migration patterns for the wildlife, let alone the impact from physical buildings.

This is a screenshot of a coyote taken from my wildlife camera 165 feet from the property. I have hundreds more videos like this of the species mentioned above.



Third, I am concerned about **flooding**. Our mailbox for our home and church are located on the east side of Old Redwood Highway, so I daily walk over to the edge of the vineyard. In the Winter, during storms, the drainage ditch fills up, as Pruitt Creek cannot handle the water on those days. We already have water back up into our church parking lot out of the ditch, because the creek is full. Development will affect how much water the ground can absorb, and worsen the problem.

Fourth, I am concerned about **increased water usage** from new development, and how that will continue to draw down the water table.

Fifth, I am concerned about the **increase in litter, vandalism, homelessness and drug use** from more people being present 24 hours a day. This area already deals with these issues, but an increase in people being present will further impact our church and residences.

Sixth, I am concerned about the **increase in traffic and noise** and how that would affect those of us who live in the area.

Lastly, I am concerned about how the Casino development would affect our church, which is directly across the street. We are a very small church that serves the community in big ways: we host a food bank distribution that averages over 100 vehicles lining up each week--added traffic will negatively impact our community. We work with at-risk youth, who would now be directly exposed to the negative impacts of gambling. We host numerous recovery groups, including Gamblers' Anonymous and Alcoholics Anonymous.

We would deal with the traffic and maintenance issues of people turning around and loitering in our parking lot (the Casino would be a non-smoking property, so where would people go to smoke?). **These maintenance issues will directly lead to an increased financial cost for our church, which will in turn negatively impact our ability to provide the key services we are currently offering our community.**

In 2020, the traffic on Old Redwood Highway was lower, and the amount of wildlife skyrocketed. I actually started dreaming that a Native American tribe would have the property and restore it to a status that works with the land. The casino proposal would do the opposite.

Rev. Josh Ratiani
Pastor, Shiloh Neighborhood Church
www.shilohnc.com

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From: [Carrie Marvin](#)
To: [TribalAffairs](#)
Subject: KOI TRIBE - WINDSOR PROJECT
Date: Tuesday, June 14, 2022 3:07:46 PM

EXTERNAL

Hi.

My name is Carrie Marvin 237 La Quinta Drive Windsor CA

I am extremely concerned about the KOI project. We have had 2 mandatory evacuations in the past few years and have voluntarily left our home due to smoke and fire several other times. We have had massive fires in our neighborhoods, mere minutes from where this site is. Our house had \$50k worth of smoke damage.

Traffic is frightening when you are fleeing from fires and to add more people in who don't live there is not going to be beneficial as we struggle to leave. It took neighbors a lot of time to evacuate during Kincade. I left sooner and I had neighbors who said they were stuck for a long time trying to get to the freeway.

We already take our 3 minute showers and replaced our lawn with bark and now you want to bring in a hotel for MORE people to access the water we don't have? We have a casino 15 minutes south and 15 minutes north of us. The KOI have no ties to Windsor or this location. My understanding is they are a Lake County tribe. Why native americans who should love our land would want to come to an area besieged with fire and drought and build on it, makes no sense to me. This is a quiet neighborhood. IT IS IN A NEIGHBORHOOD. This is not somewhere by itself. It will absolutely impact the people who live there. So rude to put a casino right in a quiet neighborhood right across from a park and ballpark where families come to play. I just cannot believe this is even being considered.

This is the WRONG location for a casino. I already had 2 neighbors in my neighborhood sell because they are so concerned with what is happening here and worried this would affect their housing prices. this was a conversation with them. Not one person I have spoken with has thought this was a good idea.

If the tribe wanted to build some homes for tribe members I would understand that. To have a casino and hotel using up our resources and adding thousands of people to our area is the WRONG thing.

Please stop this project now.

I will be another to sell if this project goes through because I will not take my life in my hands because of more hotels and casinos when I need to leave due to fire. I can't take that chance with my family's life.

Carrie Marvin

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From: [Linda McBride](#)
To: [TribalAffairs](#)
Subject: Koi Tribe proposed casino
Date: Tuesday, June 14, 2022 12:49:09 PM

EXTERNAL

I am writing to express my strong opposition to the proposed casino on the corner of Shiloh Road and Old Redwood Highway. I have lived in Windsor since 1991 and we cannot allow this to happen.

The proposed site is absolutely not the right place for this.

- 1) There is a community park right across the street where our kids play softball, soccer, etc. and have done so for years. Casinos bring strangers to the neighborhood and we cannot put our children at risk.
- 2) There is a new apartment complex being built on the opposite corner that will add traffic to that intersection and likely children to the neighborhood. We cannot afford to have even more traffic in that intersection, especially during emergencies like wildfires. It was difficult to get out of Windsor during the 2019 wildfire evacuation. Adding traffic will put lives at risk.
- 3) That vineyard is a fire break during wildfire season. The property is very close to Shiloh Park, a major wildfire risk area. We need that open space.
- 4) We are already on water restriction due to drought. The apartment complex being built will strain that further. Our infrastructure cannot handle the burden of such an enormous entertainment complex, twice the size of Graton Rancheria.

I am a gambler and I personally believe that we already have enough casinos in Sonoma County. This tribe has no connection to Sonoma County and this is not tribal land. They have no inherent right to build a casino in Sonoma County. They cannot build it in an existing residential neighborhood.

Thank you,
Linda McBride
625 Shagbark Street
Windsor, CA 95492
(707) 479-8266

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From: [Lillian Fonseca](#)
To: [TribalAffairs](#)
Cc: berdoolil@gmail.com
Subject: Koi Tribe purposed casino project in sonoma county
Date: Tuesday, June 14, 2022 9:52:16 PM

EXTERNAL

From: Lillian Fonseca-Cierley
128 Cornell Street
Windsor, Ca. 95492

RE: My opinion and thoughts on casino project by Koi Tribe

The previous e-mail I sent did not include my full personal info and I feared it would be tossed aside. I want to have a voice on this because it will definitely impact my life as a Windsor community member as well as the future for my children and grandchildren whom I hope will still be living here after I am gone.

I have multiple concerns regarding this issue. Let me try to be concise and to the point:

1. Quality of life for community, especially neighbors who are close enough to hear and see the lights, noise and traffic, will be severely disrupted. The peaceful countryside atmosphere will be destroyed forever. That's tragic.
2. DROUGHT- We are in the midst of a real drought that is certainly not going to be improved by the addition of a site such as the one being planned which will consume massive amounts of water that rightfully should be used by the local community.
3. Wildfire risks- Having been through multiple fires and evacuations in the past years I cannot imagine how traffic would not become a horrific chaotic, and possibly deadly danger, with the additional cars and casino customers adding to the mix. It terrifies me.
4. Open space/ Greenbelt area- not only is this vitally significant for native wildlife and for the small town community ambiance but once lost, forever gone. My heart breaks.
5. Neighborhood intrusion/ destruction- I never intended to buy a home in a neighborhood that would soon include a nearby mega-sized casino! As a homeowner since 1991, the thought of the loss of our family oriented community saddens me.
6. Koi Tribe? I have no idea why you chose our area— a small family friendly town, a safe place to ride bikes, go on walks on peaceful country roads (such as the ones that would be destroyed by your casino) or just sit out on your porch or deck in the evening to listen to the birds settling down for the night as the crickets sing from the vineyards — seriously, there are better locations for your casino project to be established.
7. Local Roads- our roads are not super large highway type built for large amounts of constant traffic. We have two lane roads that we use for our daily commutes and the thought of being bombarded by casino visitors at all hours, frankly, is quite disturbing.
8. Ecologically negative- the excessive noise, night light pollution, vehicle emissions and impact on ecosystems is a huge concern. Many of our roads do not have sidewalks and that in itself is a danger to pedestrians.

We love our quiet nights, and starlit skies— the sounds of the frogs singing in creeks, the cry of the hawks soaring above while the robins and mockingbirds add their songs to the concert. This casino is not a good fit for our town for so many reasons. I am sure that there are other locations that would welcome them with open arms. Please NO Casino.

Koi Nation, honor the other tribes that are native to this area— honor the balance of nature that exists in this place. Find a better location for your casino.

Thank you,

Respectfully, L. M. Fonseca Cierley
Resident of Windsor since 1990.

Sent from my iPad

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From: [Ron Calloway](#)
To: [TribalAffairs](#)
Subject: Mark West Superintendent disapproval of Koi Nation Shiloh Casino
Date: Tuesday, June 14, 2022 7:22:36 PM

EXTERNAL

I must share my steadfast disapproval of the Koi Nation Shiloh Casino and Resort Project on Shiloh Road as a resident of the Larkfield area, who lives on 531 Coachlight Place, and as the Superintendent of the Mark West School District. As Superintendent, I had to personally address the Tubbs Fire at its onslaught. I made decisions on a daily basis to ensure the safety of our children in the Larkfield area. If we were to add the casino to this traumatic event, I shudder to think what the consequences might have been with the infrastructure that is still in place today.

This week I met with the California Department of Education at their request, as an expert, regarding the next disaster as it is already assumed that one is coming. During the course of our conversation we discussed all the mitigating factors: roads, water, air quality, and many others that need to be addressed currently to prepare for the next disaster. The area that has been designated for the Koi Nation Shiloh Casino Project is not prepared, nor will it ever be, to address this future disaster.

Furthermore, I do not understand placing a casino near San Miguel Elementary School. Would any public figure who has children attending a school advocate for the construction of a casino adjacent to their school? Of course not! This is not a "Nimby" statement, as across Highway 101 there is plenty of area to develop a casino near the airport, and which would not impact the access to 101, nor impact the educational lives of children.

Respectfully,

Ronald M. Calloway
Superintendent of Mark West School District
Larkfield Resident

--

Ron Calloway

Superintendent
Mark West Union School District
305 Mark West Springs Road
Santa Rosa, CA 95404
(707) 524-2970 phone
(707) 524-2976 fax

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From: [HTK](#)
To: [TribalAffairs](#)
Subject: My strong objection to new casino/resort complex proposed bordering on southeast Windsor, CA
Date: Tuesday, June 14, 2022 5:36:03 PM

EXTERNAL

Sirs/madames:

I am a resident of Windsor, CA, and want to respectfully express my extreme opposition to the giant casino/resort development planned by the Koi tribe bordering on the town of Windsor. The project would have multiple disastrous impacts that will affect the neighborhoods located near the project, the residents of Windsor, and Sonoma County as a whole:

1. This project is not to be located in an industrial zone (as is the Graton Casino in Rohnert Park) or an largely uninhabited area (as is the River Rock casino outside Geyserville). Rather, it is within a few hundred feet of a fully populated, peaceful neighborhood of homes and parks, and directly next to a beautiful and widely used Regional Park. A huge casino/hotel/resort will be a complete disaster for southeast Windsor and the families who live there, exposing these quiet neighborhoods to constant noise, traffic, pollution, and potential crime.
2. We are in the midst of a catastrophic drought. There is absolutely no reason to believe this situation is going to improve in the future, with cycles of extreme weather and severe water shortages. It is insanity to build a development of this magnitude here which will presumably use huge amounts of water. Additionally, neither the people who run this casino (probably from another state) and who will undoubtedly receive the major profits from it, nor the patrons who would visit this casino or stay in the large hotel there will have the least personal investment in conserving water or respecting the neighborhood and town.
3. Associated with the water shortage have been season after season of disastrous fires. All residents of Windsor (including especially those living in southeast Windsor) have had to evacuate on at least one occasion. In previous major fires, there has been total gridlock of cars on Shiloh Road and Old Redwood Highway trying to reach Highway 101 or points south, along with all the residents north of there. It's clear that an additional mass of cars exiting the resort/casino will make things exponentially worse.
4. A casino is going to primarily attract clientele from other areas, 24 hours a day, who have no incentive to respect the bordering neighborhoods. In fact, I would expect noise, intoxication, drunken driving and drug use issues to dramatically increase in this area, as well as automobile accidents and burglary or other crime.
5. Just how many massive casinos does a small area surrounding Windsor "need?" There's a huge casino (Graton) just south of Santa Rosa and another (River Rock) just north of Healdsburg, both within about 15 miles of the proposed casino. All other reasons aside, it's insanity to build another casino so close to these other two. This casino would irreversibly degrade the character of the area forever.
6. I recognize Native Americans have been sadly mistreated in the past, but building a massive casino, in an area that I don't believe is even part of their historical homeland, to support the material needs of 90 tribe members seems crazy to me. If we want to invest in housing for these individuals, or education and training, I'm all for that. Not a giant casino which I guarantee is opposed by 95% of the local population.

For all these reasons, I ask that this proposed casino project be canceled, or at worst located in an area less obviously susceptible to the issues I've described.

Sincerely,
Harriss King

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From: [Eva Ingram](#)
To: [TribalAffairs](#)
Subject: No Casino in our neighborhood please
Date: Tuesday, June 14, 2022 11:07:25 PM

EXTERNAL

We already have 2 casinos which, fortunately, were not built in neighborhoods. We don't need a third. The disruption to the surrounding neighborhoods will include substantially increased traffic and associated accidents, elimination of a very popular bike route, negatively impacted real estate values, additional pressure on the limited water and power resources, and increased local crime.

Eva Ingram / 713.705.2645

*Love is patient and kind. It bears all things, believes all things, hopes all things, endures all things.
Love never fails. 1Cor.13:4,7-8*

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From: [Ana Sousa](#)
To: [TribalAffairs](#)
Subject: No Casino on my backyard
Date: Tuesday, June 14, 2022 9:36:05 PM

EXTERNAL

To whom it may concern:

I writing to state my opposition to the construction of a casino in my backyard. It is ridiculous that this is even a consideration. There are zoning restrictions that can't be ignored to allow for a casino to be build in a farming area? This is a community where we raise our children, take them to school, church and the play grounds which are all across the street from where this casino project is being proposed. There are several county zoning restrictions due to this area being zoned as farming area to preserve the community and the land which forbids projects such as a casino. This casino poses huge threat to the land and the community including the water consumption, wildfire risk, destruction of vines which is the staple of the area and the beauty that attracts so many residents and visitors to the city and sonoma county. I can't even imagine that consideration to a casino in front of my church and my house and my kids school could be accepted by the city or the county or state or federal governments. What sense does that make? This entire Casino project must not be allowed to destroy our community for the sake of a tribe's right to a land which they have no connection to or history. Such a project will be severely impactful to our quite community that has been here for generations and will destroy our community's quality of life and increase traffic, noise, concerns over safety, and our beloved shiloh park not to mention the impact on real state value to the area to name a few.

I hereby request that the county not allow a Casino to be built in my community.

Thank you.

Ana Sousa

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From: cduffy.toapartners.com
To: [TribalAffairs](#)
Subject: NO CASINO
Date: Tuesday, June 14, 2022 8:44:24 PM

EXTERNAL

Please DO NOT allow a casino/hotel complex to be approved/built on Shiloh Road. There are many, many reasons why it would be a terrible idea to allow such a business in this residential and pristine area of Sonoma County. Water usage is a top issue of why this project is not feasible as well as evacuation routes for fire escape. To even consider this project goes against what makes Sonoma County and the Windsor area so desirable. We already have two casinos in this county and that is enough. The tribe wanting the casino does not even have roots here.

This project must be stopped now and in the future.

Please DO NOT approve this project, unless you intend on buying a home across the street from it and would love to deal with the traffic, crime, noise and all the other issues that go hand-in-hand with a casino.

Thank you for protecting Sonoma County and the Windsor/Shiloh Road area.

Cynthia Duffy

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From: kyletattershall@gmail.com
To: [TribalAffairs](#)
Subject: No more Casinos
Date: Tuesday, June 14, 2022 9:41:41 PM

EXTERNAL

To whom it may concern:

I am a Windsor Resident and bought my home here in 2019. I have 3 young kids and plan to stay in this town to raise them. It worries me there is another proposed casino in our area. It is well known that Casinos bring an increase in crime and reduced home values.

The land in question is across the street from our local soccer field.

Please stand up for all the families and oppose this casino to whatever ability you have.

Thank you for your concern in this matter,

Kyle Tattershall
Windsor Resident

Sent from my iPhone

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From: [Scott Engel](#)
To: [TribalAffairs](#)
Subject: No More Sonoma County Casinos
Date: Tuesday, June 14, 2022 7:37:25 PM

EXTERNAL

Here are some of my concerns about having a casino less than a mile away from my neighborhood which has an elementary school and extensively visited County Park, Shiloh:

1. Community Health

I'm worried about higher rates of home foreclosure and other forms of economic distress and domestic violence just from having a casino erected in an obviously non-urban location.

2. A mental health issue.

Gaming can impact a person's mental health and lead to anxiety, mood swings, and atypical behavior.

In these situations, gambling is no longer an enjoyable but rather stressful activity that can cause headaches, stomach ulcers, insomnia, and muscle pain.

3. Family Health

The example we put in front of teens is that gambling is a positive, when in fact it embeds a negative positive.

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From: [Claudia Volpi](#)
To: [TribalAffairs](#)
Subject: NO on Koi Casino
Date: Tuesday, June 14, 2022 11:08:47 PM

EXTERNAL

Dear Sir or Madam,

I am writing to express my strong opposition to the Koi Casino being built on Shiloh Road.

This is a quiet residential community with many elderly people. That road is our only way out in a wildfire emergency, which we have had in the past. I am seriously concerned that we would be trapped given the rise in traffic and the drain on already limited water supplies in our area.

This tribe has no legitimate claim to this area and allowing the placement of a casino here would:

Increase wildfire emergency risk and danger to the existing community and elderly residents in case of an emergency

Seriously constrain an infrastructure that has already been taxed with increased population

Have a devastating impact on the ecology and environment of animal life with noise, pollution and already constrained water resources

Set a dangerous precedent for zoning regulations in residential neighborhoods

Lower property values

Please do not allow this project to move forward in this location. It is obvious that a tribe of this size, with no connection to this land, is being usurped by others to profit off their status. Do the right thing for your constituents, including other tribes in the county who respected zoning rules in their pursuit of their casino projects.

Thank you,
Claudia Volpi
7300 Shiloh Ridge
Santa Rosa, CA 95403

Pardon any spelling errors. Sent on the go from my iPhone.

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From: [Ginna Gillen](#)
To: [TribalAffairs](#); chad.broussard@bia.gov
Cc: ourcommunitymatters2@gmail.com
Subject: Objection to Koi Nation Shiloh Resort and Casino Project
Date: Tuesday, June 14, 2022 1:32:31 PM

EXTERNAL

I want to go on record as being very strongly opposed to the proposed Koi Nation Shiloh Casino and Resort Project.

As a long-time Windsor resident, I want the parties considering this proposal to understand that the negative impact of this development is real.

My family was forced to evacuate our home in the Kincaid fire. Even though we were given hours to leave the area and we did not wait until the last minute, the traffic on Highway 101, the only escape route, was backed up for miles and miles, causing corresponding jams on the feeder roads. Wildfire danger in the Shiloh area continues to be a threat. The effect of feeding the additional number of vehicles anticipated to be at the casino would be devastating and potentially fatal.

I could go on and on about all of the other reasons this is a really bad idea...lack of water, traffic on local roads, proximity to an elementary school and in a residential area. And beyond all this, the Koi Nation has no historical connection to this land and, therefore, no right to victimize the current residents of our neighborhood.

Virginia Gillen
9559 Ashley Drive
Windsor, CA 95492

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From: [Diane and Walter Winsby](#)
To: [TribalAffairs](#)
Subject: Oppose Koi Indian Casino
Date: Tuesday, June 14, 2022 1:23:16 PM

EXTERNAL

June 15, 2022

TO: tribalaffairs@sonoma-county.org
FM: Walter S Winsby
212 Chris Street – Windsor CA
(707) 481-5323
RE: Oppose Proposed Koi Casino - Sonoma County

I object to the proposed Koi Indian casino location and strongly oppose another casino in Sonoma County. There are already two Indian run casinos in our county and that should be enough.

There are many reasons for my opposition to the Koi's plan, all of them are due to the negative impacts the casino will bring to our county's environment as well as the fact this tribe has no historical tribal claim to the land they recently purchased. This land was supposed to be in the Greenbelt zone set up some time ago and is in the middle of a grape growing area which is situated across the streets to several residential neighborhoods. The casino will bring a huge increase in traffic, air pollution and noise to these neighborhoods never mind the expected increase in crime that will follow.

The area has already been under siege from wildfires twice in the last several years and this casino will add to the possibility of additional fires. Because of the drought we are now being asked to curtail our water use yet this casino/hotel will require additional water that isn't currently available.

Overall, I think there is a large negative environmental impact to the surrounding area of the proposed casino's property, with the additional expected loss of property values to the nearby homes/properties, if the casino is built.

Diane & Walter Winsby
Drapes & More Interiors
mail: 422 Larkfield Center, Box 261
Santa Rosa, CA 95403

(707) 578-0849

(707) 481-5288 Diane Direct line

(707) 481-5323 Walter Direct cell

website: www.drapesandmore.com

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From: [MICHAEL CHENG](#)
To: [TribalAffairs](#)
Subject: Opposed to KOI Casino in Sonoma County
Date: Tuesday, June 14, 2022 4:07:38 PM
Importance: High

EXTERNAL

To Whom It May Concern,

I reside within the Vintage Greens neighborhood. Although, I am on the west side of US-101, this casino should not be built for all of the following reasons.

- Drought/Water Availability/Mandatory Water Rationing
 - Why is this even being considered in this environment. This facility would consume waters that should be for local residents already asked to curtail water usage and conserve.
 - This facility and associated parking lots are impermeable surfaces that will only lead to more water to streams and less into the groundwater and water table
- Traffic
 - This two lane traffic that will lead to congestion and back ups.
 - Significant bus traffic with deisel exhaust emitting black smoke and PM 2.5 Particulate
- Wildfire Risk
 - Contributes to building congestion and does not provide the defensible space a vineyard does today protecting the surrounding neighborhood.
- Proximity to Residential Neighborhood, Churches, Schools
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
 - Trash generated from this site
- Noise
 - Traffic
 - Congestion noise
- Wastewater Treatment
 - This takes away from the capacity of the local wastewater treatment plant to treat waste.
 - This would result in more cost and chemicals to treat that would most likely be passed on to the community
- Impact of Ignoring Zoning Restrictions
- Public Safety
 - This facility only brings those clientele that have gambling issues are are not a cultural fit to the surrounding community
- Quality of Neighborhood Activities
 - This is located close to trails and parks and takes away from the natural greenery existing today.

- NO Connection to the land by the Koi Tribe
 - There is no right for this tribe to this area.
 - Not entitled
- Emergency Response Time
- Greenhouse Gases
 - Power and services used at this facility only contribute to the greenhouse gas emissions.
- Decline in Property Values

I STRONGLY OPPOSE THIS CASINO PROJECT AND THE AGENCIES MUST DENY PERMIT TO CONSTRUCT.

Sincerely,
Michael David Cheng
Windsor, CA Resident

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From: [Rachael Cutcher](#)
To: [TribalAffairs](#)
Subject: Opposition to Proposed Koi Casino near Windsor
Date: Tuesday, June 14, 2022 1:57:33 PM

EXTERNAL

I am writing today to express my deep concern and strong opposition to the proposed Koi casino and resort project near Windsor. I am a resident in the Wikiup residential neighborhood, two miles from the proposed development. As a long-time resident in this area, I have witnessed growth and development over the years and this growth has had an overall positive impact to the community.

I have also personally experienced the increase in extreme wildfire activity commencing in 2017. Our entire neighborhood was abruptly and unexpectedly evacuated from our homes on October 8, 2017 and after experiencing the terror of not being able to drive out of my own neighborhood due to traffic congestion at Old Redwood Highway, while witnessing flames grow stronger and homes burning mere blocks from my residence, was an experience I had hoped to never have again. But, yet it did happen again. The idea of having a large-scale resort and casino positioned at a key artery to safety is appalling and would be highly irresponsible.

With the continued extreme drought that we are experiencing, we will continue to experience the extreme weather and potential for more wildfires in our area. Adding a resort and casino will adversely affect water availability for current businesses and residents.

The proposed casino would also be placed across the street from Esposti Park and close to the Shiloh Regional Park, and directly across the street from a church. The proposed casino is two miles from the San Miguel and Mark West Elementary Schools, creating unsafe conditions for the area's children. The site being proposed is NOT in a remote location or in the heart of a primarily business district. Quite the contrary. It is being proposed directly in a residential neighborhoods.

In addition to these top concerns, I am also concerned about the impact on the overall safety of our community, the increase need for public safety presence (which is already stretched) and response times for emergency personnel whether it be crime, medical, or natural disaster, such as a wildfire.

The ecological impact and the public safety impacts are too great to approve this project. I am urging you to oppose this project. I strongly oppose a casino at this site.

Thank you,
Rachael Cutcher

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From: [Suzanne Calloway](#)
To: [TribalAffairs](#)
Subject: Opposition to the Koi Nation Casino project
Date: Tuesday, June 14, 2022 7:16:15 PM

EXTERNAL

I want to go on record as being strongly opposed to the proposed Koi Nation Shiloh Casino and Resort Project.

As a 20+ year resident of Larkfield/Wikiup, I want the parties considering this proposal to see how this development would be devastating to this area.

My street barely escaped the Tubbs fire of 2017. Evacuating was fraught with traffic jams on local streets, only to be compounded by stopped traffic on the freeway. Friends of mine had to drive through the fire and others did a u-turn on the freeway to save themselves!

Two years later, we had to evacuate our home once again during the Kincaid fire. Even though this time we were given hours to leave the area and we did not wait until the last minute, the traffic on Highway 101, the only escape route, was backed up for miles and miles, causing corresponding traffic jams on the feeder roads.

Wildfire danger in the Shiloh area continues to be a very real threat. It's not a matter of "if" there will be another fire but a matter of "when". The effect of adding the additional massive number of vehicles anticipated to be at the casino would be devastating and potentially fatal, not only to the existing residents but also to casino patrons.

There are so many reasons this project is a really terrible idea, in addition to the grave fire danger. There is the lack of water supply to the area, the increased daily traffic on local roads, the proximity to San Miguel Elementary School, and the fact that it is in an established residential area.

Beyond all this, the Koi Nation has no historical connection to this land!
What do local tribes think of this?

Please add me to the voices strongly against this project!

Suzanne Calloway
Coachlight Place
Larkfield/Wikiup

[Sent from Yahoo Mail on Android](#)

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From: [Marilyn Montero](#)
To: [TribalAffairs](#)
Subject: PLEASE DO DESTROY OUR TOWNS AND ENVIRONS FOR CASINO
Date: Tuesday, June 14, 2022 9:29:24 PM

EXTERNAL

To all the powers that be,
PLEASE DO NOT BUILD A CASINO AMONG RESIDENTIAL AREAS
where your constituents live, raise families, work, shop, worship,
recreate and drive.

A CASINO IS A DESTINATION ESTABLISHMENT. People come from
all areas of Sonoma County and the greater Bay Area to use casinos
WHEREVER they are built . There is NO NEED to place a casino in a
busy area our county. BUILD THE CASINO IN A MUCH LESS
POPULATED, MORE RURAL PART OF THE COUNTY so it will not
have such a negative effect on the family oriented township of Windsor.
WITH GREAT TREPIDATION, ANXIETY AND HOPE,

Respectfully submitted,

Marilyn Montero

Long-time Sonoma County resident

Marilyn.e@comcast.net

Marilyn Montero, DRE#00968686
Coldwell Banker Residential Brokerage
600 Bicentennial Way, Ste 100
Santa Rosa, CA 95403
marilyn.e@comcast.net
707-521-2144 office
707-484-0527 mobile

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From: [merry zavalá](#)
To: [TribalAffairs](#)
Subject: Please do not allow a Casino in Windsor
Date: Tuesday, June 14, 2022 6:16:54 PM

EXTERNAL

To whom it may concern:

We must stop the proposed casino in Windsor because of the risk to the community. I believe a casino will bring an increase in crime, noise, loss of open space and a negative effect on our community at large.

As it is we have restrictions on water and we are in an extreme drought. We are in a climate crisis. We have a gun and violence issues in this nation.

How can you consider an approval of a casino at this critical point in our history . Please consider our family based community!

Merry
Always be kind!

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From: [Christy Delucchi](#)
To: [TribalAffairs](#)
Subject: Proposed casino off of Shiloh and Old Redwood Hwy
Date: Tuesday, June 14, 2022 8:08:15 PM

EXTERNAL

To whom it May concern,

I have lived in Sonoma Country for 50 years, 40 have been in the beautiful family town of Windsor. My husband and I built our home on 1 1/2 acres and raised our 4 children. We have watched our area slowly develop with an eye to try and keep a balance that allows for homes, agriculture and different levels of parks that encourage family outings and community based interactions. During the last several years an added challenge was the overshadowing issue of global warming, drought and increased fire concerns. We have already noted that in the area of the proposed casino (which this area as far as I have researched has no significant connection by the Koi tribe) is in an area that embraces agriculture as well as neighborhood zoning. Our roads in that area which are in need of repair have had several large apartment complexes added recently, making an already congested road (Old Redwood Hwy) a nightmare to navigate on a normal day and incomprehensible during fires or other emergencies which have been happening with a greater frequency.

What of drought concerns and large hotels and building that will attract vast numbers of people using a declining resource.

It's amazing that in an area of developed agriculture and family neighborhoods an organization with NO TIES to this area can build what ever they would like that does NOT benefit or is wanted by the existing community. We already have two casinos in the area that are adequate .

Please do not allow something that is so wrong for so many reasons and will change this beautiful area for ever.

Respectfully yours,
Christy Delucchi

Sent from my iPad

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From: [Kay Hartman](#)
To: [TribalAffairs](#)
Subject: Proposed Casino on Shiloh Rd
Date: Tuesday, June 14, 2022 3:42:08 PM

EXTERNAL

To The Sonoma County Board of Supervisors:

As a Sonoma County resident, **I strongly oppose** the building of a Casino Resort on East Shiloh Road in Windsor. This is an inappropriate location for a 24 hour business that includes a 200 room hotel, six restaurants, conference center, spa and a casino. The 68 acre parcel is surrounded by several quiet neighborhoods, churches, schools, parks and a community that enjoy numerous outdoor activities.

I strongly urge that the Sonoma County Board of Supervisors listen to and support our concerns:

... FIRE SAFETY & HUMAN LIFE: We have a history of deadly fires in this area. The evacuation of an additional 20,000 plus people, casino customers, is a recipe for disaster. There is no safe way of evacuating this massive number of people from this particular area, without increasing the risk of death.

...WATER SHORTAGE/DROUGHT: Sonoma County residents are being asked to conserve water. Many of us are taking fewer showers, not watering our lawns, planting vegetable gardens, or flushing our toilets often. The amount of water needed for a huge business that invites over 20,000 people a day puts too great a water burden on the people in the area. We need that water in our community and to fight frequent fires.

Other major concerns that go well beyond the two issues mentioned above include increased crime, drunk drivers, increase in noise, lighting and traffic, plus the devaluation of our property. The loss of the fire break provided by the vineyards is extremely detrimental, because these fire breaks helped save our homes during the recent fires.

What are you thinking by approving this new casino!!! This is absolutely and unquestionably the **WRONG LOCATION** for a business operation of this size!

Sincerely,

Jack and Kay Hartman
2335 Nordyke Avenue
Santa Rosa CA 95403

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From: [Georgianne](#)
To: [TribalAffairs](#)
Subject: Proposed Casino on Shiloh Road
Date: Tuesday, June 14, 2022 5:16:21 PM

EXTERNAL

I would like to write to you to voice my opposition to the proposal to build a casino on Shiloh Road. There are so many reasons why this is not the right location for this project.

With the extremely high wildfire risk, the evacuation of not only guests of the proposed resort but our neighborhoods would create gridlock which would negatively impact the safety of all concerned.

The current infrastructure will not support the increase in traffic. Our taxes should not be used to add any additional capacity for this proposed project.

We are currently in an extreme drought. I have read that the project proposes to use wells on the property as well as a water treatment plant. Pulling water from the ground will not help. The water needs to come from nature. We're on water rationing as it is. This area can't support this increase in water demand.

This land is not significant to the Koi tribe. They are reservation shopping.

This proposed project would create increased traffic, noise and crime in our neighborhood. There are schools, parks and churches nearby. Our quiet neighborhood will no longer be a desirable place to live, impacting my quality of life and my property value.

I vehemently oppose this project.

Regard,

Georgianne Boissier
Sent from my iPad

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From: [Susan Degive](#)
To: [TribalAffairs](#)
Subject: proposed casino site Windsor
Date: Tuesday, June 14, 2022 6:29:08 PM

EXTERNAL

Please do all you can to prevent a casino in this residential and rural neighborhood. I do not believe the Koi tribe has a significant connection to the land and therefore should not be allowed to circumvent zoning regulations.

The increased traffic and noise is inappropriate in this location.

--

Susan Degive 🎵*~*~♥~🎵

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From: [Patty Grimm](#)
To: [TribalAffairs](#)
Subject: Proposed casino
Date: Tuesday, June 14, 2022 2:24:49 PM

EXTERNAL

Hello, and thanks for listening!

Beautiful Sonoma County's rural integrity does not deserve to be compromised.... and by a casino, no less!!! Agriculture being ripped up, quiet residential neighborhoods being changed forever, the all night noise? And the drought? Near a school?? There are so many reasons this is the wrong thing to do!

Please help Sonoma County retain it's beauty... and safety, by saying NO to the casino.

A concerned Santa Rosa resident.

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From: [patricia wright](#)
To: [TribalAffairs](#)
Subject: Proposed casino
Date: Tuesday, June 14, 2022 4:14:23 PM

EXTERNAL

Hello folks, we are sending this email to make sure you understand we are strongly against the Koi proposed casino on the southern edge of the Windsor Town limits. We have been residents of Windsor since 1992, and have enjoyed seeing Windsor grow into a balanced community that offers what we need for local recreation, education, and subsistence for our family. The proposed casino right next to the town limits might as well be in the limits, and would bring to the community a host of unwanted attributes including increased traffic, a drain on our resources like water and electricity, and an influx of patrons from way outside our area that would offer no intrinsic value. We also frequently hike Shiloh Ranch Regional Park, and can't imagine the environmental blight that would be projected by the proposed casino from the views from most of the park's trails. Thank you for fighting this proposed casino with us! Jim and Patti Wright

Sent from my iPad

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From: [Carol Rash](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Tuesday, June 14, 2022 4:16:01 PM

EXTERNAL

to Sonoma County Tribal affairs,

I am writing regarding the proposed Koi Casino in Windsor.

My husband and I have lived in Windsor since 1988 and have been pleased with the way our town has improved and grown since we moved in. The proposed Casino will be the largest in Northern California and will increase traffic and congestion in our area.

In 2019, we had to evacuate our town due to the Kincade Fire heading towards it. By Evacuating, our town was saved by the fire crews taking a stand. We had time for evacuation unlike many other towns that ohave been consumed by fires , but it took hours for an orderly evacuation because there are 2 main evacuation routes: US 101 and Old Redwood Highway. If the Casino is built and evacuation has to take place, the funneling of the extra people from the Casino could cost lives and cause more confusion.

We have been on drought water restriction this summer and previous drought years. The casino will have to drill wells which will lower the water table. We conserve water in our home, but visitors to the Casino and Hotel will not restrict their water use.

There are 2 other Casinos in Sonoma County and adding a third will not be a benefit for our area.

Please help our community by stopping this Casino from being built

Thank you for your attention to this matter.

Carol Rash
180 Dartmouth Way
Windsor, California 95492

rashcarol@yahoo.com

Sent from my iPad

[Sent from Yahoo Mail for iPad](#)

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From: [Teara Barnes](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Tuesday, June 14, 2022 4:22:47 PM

EXTERNAL

Please, please don't let this happen. Windsor and No. Santa Rosa, Larkfield, Mark West is not an appropriate place for a casino, much less a project of this magnitude. It will most surely ruin our small town, our communities, the ambiance we all enjoy. Crime is already heightened here. I implore you, DO NOT ruin this area by allowing this project to go forward. There are SO many areas where it would be more appropriate and less destructive!!!
Sent from my iPhone

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From: [Diane and Walter Winsby](#)
To: [TribalAffairs](#)
Subject: Proposed India Casino - Koi
Date: Tuesday, June 14, 2022 1:18:47 PM

EXTERNAL

June 15, 2022

TO: tribalaffairs@sonoma-county.org
FM: Diane K Winsby
212 Chris Street – Windsor CA
(707) 481-5288
RE: Oppose Proposed Koi Casino - Sonoma County

I object to the proposed Koi Indian casino location and strongly oppose another casino in Sonoma County. There are already two Indian run casinos in our county and that should be enough.

There are many reasons for my opposition to the Koi's plan, all of them are due to the negative impacts the casino will bring to our county's environment as well as the fact this tribe has no historical tribal claim to the land they recently purchased. This land was supposed to be in the Greenbelt zone set up some time ago and is in the middle of a grape growing area which is situated across the streets to several residential neighborhoods. The casino will bring a huge increase in traffic, air pollution and noise to these neighborhoods never mind the expected increase in crime that will follow.

The area has already been under siege from wildfires twice in the last several years and this casino will add to the possibility of additional fires. Because of the drought we are now being asked to curtail our water use yet this casino/hotel will require additional water that isn't currently available.

Overall, I think there is a large negative environmental impact to the surrounding area of the proposed casino's property, with the additional expected loss of property values to the nearby homes/properties, if the casino is built.

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From: [Rosheen Foote](#)
To: [TribalAffairs](#)
Subject: Proposed Koi Casino
Date: Tuesday, June 14, 2022 6:46:15 PM

EXTERNAL

Hello,

I am writing to add my strong opposition to the location of the proposed Koi Casino at the corner of Old Redwood Highway and Shiloh Road.

The most important reason being that although I support Native Americans utilizing their lands for economic prosperity, I believe the Koi Nation is looking to establish themselves in the financially lucrative location of Sonoma County instead of one truly connected to their Tribe. This provides an opening for non-Sonoma County tribes to displace those tribes that have a long and detailed connection to the land here.

Another reason is obviously the impact to the surrounding homes and community spaces. Shiloh Road is not only a suburban residential area with some homes dating back over 50 years, it is the location of the Shiloh Ranch Community Park and Esposti Park. Both of these parks are cherished locations for Sonoma County Residents. Families gather at Esposti Park for t-ball, baseball, and soccer. You often see kids playing in the fields just enjoying the open space. Shiloh Ranch Community Park is a popular destination to commune with nature, see wildlife, hike the hills, and enjoy the quiet serenity of the park. A casino directly next to these two community parks would destroy the ability to use them as intended, disrupt the wildlife protected by the open space, and cause a unnecessary burden on the roads leading to the parks.

Additionally, a casino in this location creates a community hazard. Windsor has experienced multiple fire threats in that very area during the last several years. Mandatory and advised evacuations have been a recent reality. A large casino with a potentially enormous capacity would overload the already limited evacuation routes. Shiloh Road only has one lane leading to highway 101, It would also tax our first responders when trying to deal with both the town's needs and the casino's needs.

Thank you for listening,
Rosheen Foote
139 Dartmouth Way
Windsor, CA 95492

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From: [Josephine Hamilton](#)
To: [TribalAffairs](#)
Subject: proposed Koi casino
Date: Tuesday, June 14, 2022 8:02:31 PM

EXTERNAL

While I support the Koi Nation's right to establish such a casino, i strongly oppose the proposed location at Old Redwood Hwy (ORH) & Shiloh Rd.

Sonoma County already has 2 such casino's along the 101 corridor. What impact would this have on the existing establishments? What impact on public resources (police, roads, hospitals).

This location is adjacent to residential a neighborhood, park, church, and a large apartment building under construction on the NW corner of Shiloh & ORH.

Wildfire risk is real. Evacuation routes would be greatly impacted with additional traffic in an emergency.

This land use is not consistent with County Zoning.

Water is another impact. True the existing vineyard uses water, but that water goes right back into the ground. Large buildings with large parking lots block water use recharging the ground.

This project would increase greenhouse gases when the goal is to lower them.

Surely the Koi Nation can find a more suitable location closer to their lake county ancestral lands which could provide a much needed economic boost to that region.

Respectfully,

Josephine Hamilton
Windsor

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From: [Maisie McCarty](#)
To: [TribalAffairs](#)
Subject: Proposed Koi Nation Casino In Our Neighborhood
Date: Tuesday, June 14, 2022 5:27:53 PM

EXTERNAL

We are writing to voice our STRONG opposition to the proposed Koi Band Casino for our neighborhood. This proposed casino would strongly impact the wildfire risk in our neighborhood and would severely jeopardize our evacuation route. We have already evacuated twice for wildfires which came close- the addition of some 25,000 cars per week into our neighborhood would serve as a barrier to any safe evacuation route. In addition so much traffic would impede emergency response time.

In addition, the amount of proposed water use by such a huge entity would impact the neighborhood - some of our neighbors close to that site already have very fragile wells and the Koi nation would need additional well(s). The quality of use of Esposti Park by baseball teams and others would be severely limited by increased traffic and lack of parking.

The noise impact would be tremendous in this quiet bucolic setting.

The Koi band has ignored zoning restrictions in the area in order to serve their desire to alter the entire neighborhood.

Further, their ancestral lands are not even in Sonoma County, but Lake County....they have no ancestral rights in this neighborhood.

Five other Native American tribes who do have ancestral lands in Sonoma County have written objections to this plan and are wholly against it. County Supervisors have a resolution against this plan.

This casino would only be a few yards from a large residential neighborhood which has been here for many years. For all of the above reasons and many more, we could not be more opposed to this plan by the Koi Band of Pomos. It is a very bad proposal.

Very truly yours,
Mary M. McCarty
L.W. Harrison
6251 Lockwood Dr.
Windsor, CA

Sent from my iPad

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From: kst@sonic.net
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO
Date: Tuesday, June 14, 2022 4:15:13 PM

EXTERNAL

TO: TRIBAL AFFAIRS, SONOMA COUNTY, CA

MESSAGE: I AM COMPLETELY **OPPOSED TO A CASINO RESORT** LOCATED ON SHILOH ROAD SANTA ROSA, CA BECAUSE OF THE FOLLOWING HARMS TO THE RESIDENTIAL NEIGHBORHOODS THAT SURROUND THIS LOCATION:

TRAFFIC CONGESTION AND GRIDLOCK AT THIS LOCATION AND THE CONNECTING ROUTES TO OLD REDWOOD HIGHWAY - THIS ROUTE ALREADY HAS OVER 10,000 VEHICLES DAILY AND A CASINO RESORT WOULD ADD TENS OF THOUSANDS MORE VEHICLES TO SHARE THE SAME TRANSIT ROUTES. THERE IS NO CAPACITY TO EXPAND TO ACCOMODATE THIS INCREASE. THE INCREASED TRAFFIC WILL CAUSE HARM DUE TO INCREASED NOISE, 24 HOURS A DAY, INCREASED RISK TO PUBLIC SAFETY DUE TO INTOXICATED DRIVING IN NEIGHBORHOOD AREAS WHERE ELEMENTARY SCHOOLS ARE LOCATED AND SHARE THE SAME DRIVING ROUTES, IMPAIRMENT OF EMERGENCY RESPONSE VEHICLES DUE TO GRIDLOCK AND CONGESTION, INCREASE IN AIR POLLUTION AND GREENHOUSE GASES. THIS TRAFFIC CONGESTION WILL CAUSE HARM TO PUBLIC SAFETY DURING EVERY WILDFIRE EVACUATION. INCREASED CASINO TRAFFIC WILL ALSO PRESENT GREATER RISK TO THE ELEMENTARY SCHOOLS CLOSE TO THIS PARCEL, BY BRINGING MORE PEOPLE INTO THE AREA.

A CASINO RESORT DOES NOT BELONG IN A RESIDENTIAL NEIGHBORHOOD AND WILL BE IN DIRECT CONTINUOUS CONFLICT WITH THE DAILY LIVES OF RESIDENTS LIVING IN THE ADJACENT RESIDENTIAL NEIGHBORHOODS; A GAMBLING CASINO RESORT BUSINESS DOES NOT BELONG IN A LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS.

THERE IS NO OTHER CASINO RESORT IN NORTHERN CALIFORNIA LOCATED IN AN AREA ZONED ONLY FOR RESIDENTIAL AND AGRICULTURAL USE, AND NO COMMERCIAL USE. THE SONOMA COUNTY GENERAL PLAN PROHIBITS COMMERCIAL USE IN THIS AREA AND COMMERCIAL USE WOULD REQUIRE A FULL HEARING AND REQUEST FOR A CHANGE IN ZONING; THIS WOULD NOT EVER BE ALLOWED AT THIS LOCATION BECAUSE THE PUBLIC WOULD OPPOSE IT.

OVERWHELMING DETRIMENTAL HARM TO ESPOSTI PARK AND SHILOH REGIONAL PARK DUE TO IMMEDIATE PROXIMITY OF THESE PARKS TO THIS LOCATION - OVERCROWDING OF PARKS DUE TO INCREASE IN CASINO VISITS DAILY, LOSS OF SCENIC VISTAS AND CORRIDORS AND DEGRADATION OF THE AESTHETICS OF VINEYARD LANDS IN SONOMA COUNTY WINE COUNTRY; THIS IS PREMIUM VINEYARD LAND, WHICH IS IN LIMITED SUPPLY IN SONOMA COUNTY. LOSS OF THIS ACREAGE WILL ALSO CAUSE HARM TO THE RIPARIAN CORRIDOR AND LOSS OF WILDLIFE HABITAT, AND DIMINISH THE WATER IN THE FLOOD PLAIN WHICH RECHARGES GROUND WATER AND LOCAL WELLS.

AND LOSS OF THE GREENBELT OPEN SPACE PLANNED BY THE TOWN OF WINDSOR FOR ITS TENS OF THOUSANDS OF RESIDENTS. PLEASE SUBMIT THESE CONCERNS IN THE COUNTY'S NOTICE OF PREPARATION FOR NEPA AND THE TRIBAL ENVIRONMENTAL IMPACT REPORT. CATHLEEN BELDEN

- Wildfire Risk
- Proximity to Residential Neighborhood, Churches, Schools
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Public Safety
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases

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From: [Kristine Hannigan](#)
To: [TribalAffairs](#)
Subject: Shiloh Casino Opposition
Date: Tuesday, June 14, 2022 1:35:02 PM

EXTERNAL

Hello,

I live near the proposed Shiloh Casino on Lockewood. The vineyards beyond my house back up to Shiloh. I STRONGLY oppose this project. In fact, for our family's safety and health we would probably move if this is to happen. There are so many reasons I don't want this to happen. THIS IS A NEIGHBORHOOD.

The main ones for my family are fire safety, Quality of neighborhood, Noise (I moved here to be in an open space). In addition to all these reasons: Proximity to Residential Neighborhood, Churches, School, Infrastructure Roads Loss of Open Space/Greenbelt, Negative Ecological Impact, Noise, Drought/Water Availability/Mandatory Water Rationing, Impact of Ignoring Zoning Restrictions, Public Safety, Quality of Neighborhood Activities (kids can't play outside with this), Emergency Response Time, Greenhouse Gases and lastly Decline in my property value because no one wants there house a stone's throw from a casino.

I am opposed to ANY casinos in neighborhoods and I think it is the wrong place to have a casino. If they want to do it off the freeway in a business district it makes more sense. But what is also important Koi have NO significant Connection to the land by the Koi Tribe. I understand they relocated to Santa Rosa but that is not a significant connection historically.

I support them building a casino from where they are from in Clearlake and even if it has to be somewhere else - NO CASINOS in NEIGHBORHOODS please.

Thank you,
Kristine

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From: [Michel Degive](#)
To: [TribalAffairs](#)
Subject: Shiloh Casino
Date: Tuesday, June 14, 2022 4:23:52 PM

EXTERNAL

I am totally opposed to building this casino in our semi-quiet residential neighborhood. This is NOT Indian land!!!

You are going to ruin beautiful green space made of vineyards!

This will be increasing traffic which has already been increased by multiple low income housing projects that were built and are being build on Redwood hwy, we certainly don't need more!

We don't need the noise, the pollution and the possible crime that it will create.

Please stop this project Now!

Michel Degive

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From: eddie.flayer@att.net
To: [TribalAffairs](#)
Subject: stop the casino
Date: Tuesday, June 14, 2022 12:40:53 PM

EXTERNAL

What a completely weird place to put a casino. Who needs another casino? We did some bad things to the Indians but that's no reason for them to necessarily do bad things to the people in this neighborhood. This is a lovely part of the county near residences and regional and neighborhood parks. Why completely transform and ruin it for all who appreciate it now. Will Sonoma County residents visit the casino or mostly outsiders who will drive or be bussed in? Send them to Graton or any of the existing venues now available. I see no value.

Stop the casino.

Eddie Flayer
Santa Rosa

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From: janetpalma1@gmail.com
To: [TribalAffairs](#)
Subject: The proposed casino in Windsor.
Date: Tuesday, June 14, 2022 4:22:55 PM

EXTERNAL

I oppose another casino in Sonoma county. The water it would use is reason enough, but the image of casinos in every town is so unattractive.

Please do not go forward with this.

Janet Palma

Sent from my iPhone

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From: [barblester](#)
To: [TribalAffairs](#)
Subject: vote No
Date: Tuesday, June 14, 2022 9:12:34 PM

EXTERNAL

In regard to the new proposed casino in Windsor, vote NO!!

Wrong place. Wrong time.

Thanks, Barb Lester

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From: [Janice Flatto](#)
To: [TribalAffairs](#)
Subject: We don't need another casino!
Date: Tuesday, June 14, 2022 5:38:18 PM

EXTERNAL

- Wildfire Risk
- Proximity to Residential Neighborhood, Churches, Schools
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory

*Janice Flatto R.N.
945 Wright Street
Santa Rosa, CA 95404
707 546 6119*

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From: [Padi Selwyn](#)
To: [TribalAffairs](#)
Subject: Windsor casino - opposition
Date: Tuesday, June 14, 2022 3:57:31 PM
Attachments: [image.png](#)

EXTERNAL



To Whom It May Concern:

Neighbors to Preserve Rural Sonoma County, a local environmental organization representing over 2,800 residents, is writing in opposition to the proposed casino in Windsor.

The location of the proposed development is on a narrow county road where wildfire risk is significant. Residents in adjacent subdivisions would have a very difficult time escaping a wildfire with the traffic congestion that would accompany a major casino. There is simply not the infrastructure in this area to safely accommodate a major development.

In addition, drought conditions alone should prevent such a large project from being developed. With mandatory water rationing, a project of this scale is completely inappropriate.

The property has no significant connection to the land by the Koi Tribe as well.

Thank you for taking these matters into consideration.

Padi Selwyn
(707) 569-6876

PRESERVE RURAL SONOMA COUNTY

Visit our website at - <http://www.preserveruralsonomacounty.org>

Like us on Facebook - <https://www.facebook.com/preserveruralsonomacountyg>

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From: [rturner](#)
To: [TribalAffairs](#)
Subject: Windsor Casino
Date: Tuesday, June 14, 2022 8:55:32 PM

EXTERNAL

We strongly protest a casino being built in this area. The infrastructure simply cannot sustain a development of this magnitude and it will have a severe negative impact on not only the surrounding neighborhood but the entire north portion of Sonoma County.

As elected officials it is your duty to protect our resources and the impact this would have on our environment, economy and individuals.

Best,
Ramona and Ron Turner

Sent from my Verizon, Samsung Galaxy smartphone

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From: [Mary Pulcheon](#)
To: [TribalAffairs](#)
Subject: Windsor casino
Date: Tuesday, June 14, 2022 3:28:19 PM

EXTERNAL

I strongly object to this development for a myriad of reasons. 2 main ones are the environmental impacts and the infrastructure, or lack of. When the wildfires hit there will be pure chaos trying to evacuate all the residents, not to mention the hundreds, if not thousands that might be staying at the casino and hotel. The water use would be staggering and loss of a massive amount of open state would irresponsible.

Please do not support any further progress on this insulting, dangerous, wasteful proposed project.

Sincerely,

Mary Frances Pulcheon

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From: [R.G](#)
To: [TribalAffairs](#)
Cc: harvard75@gmx.com
Subject: Casino at Shiloh
Date: Monday, June 27, 2022 8:36:37 AM

EXTERNAL

Dear County Supervisors,

As a survivor of the 2017 fires, and being stuck in emergency wildfire evacuation traffic in Larkfield at River Road during the fires, I am absolutely appalled and vehemently opposed to bringing in a huge casino with thousands of people who will also need to evacuate in the event of a fire. Already the congestion at River Road, worsened by the loss of the Fulton exit, is backed up every day. IN a wildfire it was gridlock and the fires came within feet of where we were stalled in traffic!! The vineyard behind our home was scorched and our only way out blocked with traffic!! We are courting tragedy to bring in more people to an already difficult evacuation situation. Already a planned Retirement Community is planned in Larkfield which will impede evacuation at River Road also. All of this development strains an already strained traffic system. Adding a casino to this environment is putting your citizens at increased risk in the event of a wildfire evacuation situation.

We are already asked to conserve more and more water, with some of us unable to water our gardens sufficiently and doing without showers to help save water while we watch vineyards surrounding us stay green and lush. Exactly how much more will we have to conserve in order to accommodate these two large developments within the Larkfield area. We like Larkfield because of the somewhat rural and pleasant surroundings, a casino will absolutely destroy the peace of the surrounding community and suck our water dry so we cannot enjoy our homes any longer for lack of proper water for our lives.

I am not opposed to the tribe having a business just not an immoral casino which will bring down our home values and destroy the peace and enjoyment of our community and Shiloh Park. Why not develop a useful business in that area, not a casino which will encourage immorality in our community?. Why make life that we work so hard for, worse for us in Larkfield? There is a children's park as well as family homes right across the street, Is a casino the type of environment we want for raising our children here in Sonoma County?

This casino endangers the Shiloh foothill communities!

I am thoroughly and vehemently opposed to any more casinos
Sincerely
Rebekah Goodall

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From: [Laura Wilson](#)
To: [TribalAffairs](#)
Subject: Casino proposal at Shiloh Road and Old Redwood Highway
Date: Monday, June 27, 2022 8:36:35 AM

EXTERNAL

I am writing to express my opposition the the proposed casino at the location stated above. This is the wrong location for a casino complex of this size. The location across from residential neighborhoods create dangerous situations for those neighborhoods. Just 3 years ago, these neighborhoods along with the whole town of Windsor were evacuated because of the threat of fire and the roads were filled with cars. My husband and I were among those that needed to evacuate. With possible huge numbers of people going to the casino, that would really exasperate a scenario, should it happen again. And as we are experiencing a drought with a changing climate, the extra draw on our water resources is just another threat to the surrounding neighborhoods. Just the whole gambling culture is not good for the area and we already have 2 casinos in the county that are NOT located in neighborhoods doing business. I strongly oppose this project and ask that it be denied.

Sincerely,
Laura Wilson

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From: [rocio.martinez](#)
To: [TribalAffairs](#)
Subject: Koi casino
Date: Monday, June 27, 2022 8:36:45 AM

EXTERNAL

How many more casinos should we expect in Sonoma county? We've been very clear about the disruption to daily life and community that a new casino will bring. It does more harm than good! We understand it brings money in but it's not for the community, it fattens the pockets of all those who went against the community concerns and allowed the process of planning the casino go forward. It's exactly the same thing that happened in Rohnert Park!

Our main concerns listed below:

Wildfire Risk · Proximity to Residential Neighborhood, Churches, Schools · Infrastructure Roads · Loss of Open Space/Greenbelt · Negative Ecological Impact · Noise · Drought/Water Availability/Mandatory Water Rationing · Impact of Ignoring Zoning Restrictions · Public Safety · Quality of Neighborhood Activities · No Significant Connection to the land by the Koi Tribe · Emergency Response Time · Greenhouse Gases · Decline in Property Values

My hope is that it's not too late to stop the plan.

Thank you,
Rocio Martinez

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From: [Sally Jacoby](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Wednesday, June 15, 2022 10:52:01 AM

EXTERNAL

I am a Wikiup resident and walk the area that would be casino.

I am against developing this beautiful area with wild life and birds.

Please do not develop this area.

Open space and corridors between Santa Rosa and Windsor were in original open space designed by county's supervisors. The more you develop between Cotati Petaluma Santa Rosa and Windsor and develop in what is left of open space is turning Sonoma County into San Jose! Please stop this kind of development and give some chance to what is left of our bird and wildlife trying to survive! I have not seen RedWinged black birds this spring for the first time.

Birds and wild life in crisis in Sonoma County.

Please help the birds people and wild life and do not allow Casino!

Thank you

Sally Jacoby

Homeowner Wikiup 30 years.

Sent from my iPhone

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From: [Kevin Krystofiak](#)
To: [TribalAffairs](#)
Subject: Casino Development
Date: Wednesday, June 15, 2022 2:21:22 PM
Attachments: [image001.png](#)
[image005.png](#)

EXTERNAL

This is being drafted in response to the potential Casino being built on Shiloh Road. This is a predominantly residential neighborhood and is a terrible location to build a new Casino. I was actually in favor of Graton as it was isolated from residential housing and is in an area that houses large buildings. I would also be curious why Sonoma County would need to large Casino's 10 miles from each other?

Kevin Krystofiak, Founder, Financial Planner
50 Francisco Street, Suite 257, San Francisco, CA 94133
Phone: 415-291-0202 Ext: 102 Fax: 415-291-0203
kevin.krystofiak@prudential.com
CA Insurance License #0C28721
<http://www.bwpsf.com>



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From: [Stephanie Brazell](#)
To: [TribalAffairs](#)
Subject: Casino location
Date: Wednesday, June 15, 2022 6:04:55 PM

EXTERNAL

To whom it may concern,

The proposed casino location on Shiloh rd is a terrible waste, please don't put it there. The swath of road from faught to Shiloh that passes Shiloh ridge regional park is such a special moment in the area; while driving there I generally can't hold a conversation. It's a snapshot of why we live here: vineyards, oaks, and rugged mountains. The increased traffic through the area would be a disservice to the nature there and to the patrons of the beautiful regional park not to mention their safety walking on the road. My mom was hit head on by a drunk driver leaving a local casino while she was on her way to work! I see no reason for the casino to be in such a pretty spot- why not find something closer to the airport? Less pedestrian danger?

Thank you for your consideration
Stephanie Brazell, concerned citizen

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From: [Catherine Correia](#)
To: [TribalAffairs](#)
Subject: Casino on Old Redwood Hwy and Shiloh
Date: Wednesday, June 15, 2022 9:06:37 AM

EXTERNAL

Good Morning,

I cannot even believe that an Indian Tribe that has NO connection to this local area, is considering a HUGE Commercial endeavor on a pristine agricultural site. The roads simply cannot handle it. We have already been extremely negatively impacted by the hospital on River Road. Have you ever tried to get from Old Redwood Hwy to the freeway since it's been built? Not easy! And then add another bottleneck to Shiloh Road? Which already takes 3-4 lights to get to the freeway from Old Redwood Hwy there! Oh yes, and the new apartment complex across the corner, as if that won't add enough roadway backup! Stop this insanity! Our roads cannot handle it! Not to mention the problems it will cause to the subdivision across the street. Would you all like this casino in your back yard? I think not.

We already were at a high risk to evacuate the Larkfield area during the Tubbs fire, we'd have NO chance of getting out If you throw in a casino into the mix. We are not out of danger from fires, neither from water shortages.

We already hear sirens running up and down Old Redwood Hwy daily, you're Casino would just add more noise to a beautiful area.

It's a bad location for one, period. Please don't consider it seriously. It's a really, really bad idea.

Sincerely,

John and Catherine Correia

41 Sussex Dr.

Larkfield

Sent from [Mail](#) for Windows

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From: [Fowler Hoffman](#)
To: [TribalAffairs](#)
Subject: Casino on Shiloh Old Redwood Highway
Date: Wednesday, June 15, 2022 2:10:03 PM

EXTERNAL

I feel the casino on Shiloh Road/Old Redwood Highway could be an asset to Sonoma County if done properly with attention to strictly mitigating all environmental impacts. In addition to the jobs it would offer, the economic boost to our Native American neighbors will have a ripple effect on our county's well-being.

Thank you for your careful consideration of the project.

Mary C Hoffman

Windsor homeowner

Sent from [Mail](#) for Windows

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From: [Susan Freeman](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Wednesday, June 15, 2022 7:18:09 AM

EXTERNAL

Sent from my iPhone

No casino in our neighborhood please. It will ruin the environment of a peaceful community. For you it is all about how much money you will make. For us it is about neighborhood community peacefulness.

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From: [Steve](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Wednesday, June 15, 2022 8:15:48 AM

EXTERNAL

No more free handouts, enough already

[Sent from the all new AOL app for iOS](#)

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From: [michael newman](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Wednesday, June 15, 2022 8:42:27 AM

EXTERNAL

Dear board, I am quite opposed to the idea of having the KOI casino built in the area because of water consumption and increased road usage. Green belt areas are important to wildlife and human mental stress relief. As you are aware you are about to start taxing us who live on properties that recycle all of the water that we use be it well or company pumped,through are septic systems, we in the community do not need a casino expelling water resources .

Thank you for your time.

Michael

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From: [Sharon Cousins](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Wednesday, June 15, 2022 10:17:20 AM

EXTERNAL

Why do we need another Casino? This tribe has no connection to this piece of land. To place it in a residential area next to a popular park and residential area is crazy. Water, fire, traffic are only a few of the concerns. Are the people advocating for this living across the street?

Sharon Cousins

Tamara way

Windsor

Sent from my iPhone

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From: [Tom Thornsley](#)
To: [TribalAffairs](#)
Subject: Faulty NOP for KOI Casino
Date: Wednesday, June 15, 2022 1:21:08 PM

EXTERNAL

To Sonoma County Planning:

[Koi Nation of Northern California Shiloh Resort and Casino Project – Environmental Assessment / Tribal Environmental Impact Report \(shilohresortenvironmental.com\)](#)

If you read the notice on the website link you will not see a project description that outlines what the casino includes. An NOP is supposed to include the building size, hotel room count, conference center capacity, operation such as concerts, dining capacities and more so the public knows what is involved and what concerns they should comment on. Without this information the NOP is flawed and thus not in compliance with CEQA. I know this project must comply with NEPA but the standards should be the same. I believe the notice and comment period needs to start again with a project description and not just a statement about using the land for a casino.

Please advise if I am missing something about the NOP and its intent.

Tom

Sent from [Mail](#) for Windows

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From: [BELVA MITCHELL](#)
To: [TribalAffairs](#)
Subject: Fwd: Communication for Bureau of Indian Affairs - ACTION NEEDED NOW!!!!
Date: Wednesday, June 15, 2022 4:46:56 PM

EXTERNAL

We are in strong opposition to this project for all of the reasons listed in this message. Also as residents in close proximity to the Esposti Park ,in the last 5 years there has been a significant increase in noise from many sources . Loud dogs, motorcycles, vehicles with loud exhausts,large trucks with engine brakes, construction along Old Redwood Highway and emergency vehicle sirens are very prominent.

The traffic volume /vehicle noise at this location and vehicle speeds are currently a concern. In the early evening and early night time it is like being at a race track. I have expressed this concern to the Windsor Police approximately 6 months ago. There does not seem to have been any enforcement to curtail the situation. At times there are vehicles including RV's in front of Esposti Park on the Old Redwood Highway over night with occupants inside. I am concerned that all of the items will only worsen if the Casino is approved.

Thank you for considering our concerns.

Clarence & Belva Mitchell

Sent from my iPad

Begin forwarded message:

From: Casino Opposition - OurCommunityMatters
<ourcommunitymatters2@gmail.com>
Date: June 15, 2022 at 5:45:22 AM PDT
Subject: Communication for Bureau of Indian Affairs - ACTION NEEDED NOW!!!!

SECOND REQUEST!

IMMEDIATE ACTION NEEDED!!!

This is the second and **MOST IMPORTANT REQUEST!**

It is urgent that you respond to these requests IMMEDIATELY.

On May 27, 2022, The Press Democrat published a Notice of Preparation of Environmental Assessment/Tribal Environmental Impact Report.

What this means to our fight against the proposed casino location is that notice **starts a 30-day Scoping Comment period between May 27th and June 27th.**

This is the ONLY TIME we will be able to let the **BUREAU OF INDIAN AFFAIRS (BIA)** know our specific environmental concerns related to the proposed casino site.

DEADLINE 6/27

WHAT: Send an **email** (preferred method) or **mail** to the BIA using the templates we are supplying and selecting all or some of the Statement of Issues that you feel strongly about.

When: NOW! As soon as you receive this message.

MORE: **Please share this request with everyone you possibly can. We want thousands of emails sent.**

1st Template: is for US Mail

2nd Template: is for Email

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Date

To: Bureau of Indian Affairs, Pacific Region

Re: Comments on the proposed Koi Nation Shiloh
Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a

full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

INSERT STATEMENTS/COMMENTS HERE

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

TO: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

List of Statements/Issues

**Choose the ones that mean most to you
and include in your email to the BIA.**

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools

served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as

pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti

Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone.

https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction,

possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on

River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the

proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please

study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development.

Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have

financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area

surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American

Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and

Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground

water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "Wildfire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincadee Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the

response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County.

Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence,

allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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From: [Dwight Haldan](#)
To: Chad.broussard@bia.gov; [TribalAffairs](#)
Subject: KOI - Shilo Casino project
Date: Wednesday, June 15, 2022 5:27:54 PM

EXTERNAL

Dear Folks:

I was not clear as to which whom I should direct this email, so am sending to both of you. This is coming from a family that has a home in the general area.

My family and I are fully opposed to this project and on several grounds.

- 1) I am not certain that an out-of-area tribe should have the right to [presumably] purchase land wherever it wants to and expect that it can create additional tribal lands for a commercial project. I understand that this is a Lake County (Lower lake) tribe that has no real connection with Sonoma and definitively not with this area.
- 2) Assuming that hurdle is somehow ever met, this is the wrong place for such an endeavor. At Shilo Road and 101 there are many commercial areas that already exist. This however would be within a residential neighborhood with school, parks, peaceful settings—all of which would be terribly and irrevocably upended if this project are to be allowed. Casinos are, for better or worse, historically known to attract people with a variety of ailments (drug/alcohol/gambling addictions) which further lead to a general increase in crime which would lead to a degradation of the surrounding residential and agricultural communities and value of properties. It would all endanger the residents of the neighborhoods.
- 3) Aren't there sufficient casinos in the area already?
- 4) The extensive environmental harm and changes would need ample studies, to include all forms of pollution—traffic, noise, light, chemical, etc. And the need for increased services and support (utilities, sewer, water) come at a very bad time for California.
- 5) Giving the public only 30 days is too little notice—especially starting just before a long weekend; it is downright unfair.
- 6) Trying to 'buy' into this by pulling the project up by enticements [such as claiming union labor would be used and it would create many jobs] is not genuine. I am certain that there will be an increase in jobs—as the need for increased police, fire and medical personnel will be increased, as well as increased expenses for all except the financial backers of this poorly-thought out idea.

Please reject this project in its entirety.

Respectfully submitted,

Dwight Haldan, J.D.

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From: [Janet S Marsten](#)
To: [TribalAffairs](#)
Subject: Koi Casino Proposal
Date: Wednesday, June 15, 2022 2:19:32 PM

EXTERNAL

RE: Koi Casino Proposal
Dear Representatives,

Our quiet Sonoma, Windsor, residential neighborhood is threatened by a proposed casino resort by the Koi Nation from Lake County. This must be stopped.

We have had many mandatory evacuations in the last few years due to wildfires. There is a genuine lack of evacuation routes in our area. The density a 24/7 casino would create would add to an already tenuous situation. Also, as everyone who lives here knows, drought is also a very real part of our lives and wells are running dry. The Russian River could not support a huge development such as this.

This is a peaceful community with a wildlife green space, a regional hiking park, and a little league park directly across from the proposed site. Our country roads are also popular with many group, tourist, and team bicyclists. I hate to imagine the threat to public safety and congestion this project would create.

Casinos unfortunately bring with them crime and noise. It is unfathomable that this could happen to our neighborhood.

Thank you for your time,
Janet Marsten, Sonoma County resident

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From: [RandomMuse](#)
To: [TribalAffairs](#)
Subject: Koi Casino
Date: Wednesday, June 15, 2022 8:41:06 AM

EXTERNAL

Hello,

Please do not build a casino across the street from Shiloh Regional Park, one of the best parks in Sonoma County. It is unbelievable that this project is even being considered; the tribe is not from Sonoma County, Sonoma County has plenty of casinos already & this entire project is a crazy idea.

Brent Gudzus
Windsor, California

Sent with [Proton Mail](#) secure email.

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From: [John Kamola](#)
To: [TribalAffairs](#)
Subject: KOI Casino
Date: Wednesday, June 15, 2022 8:44:08 AM

EXTERNAL

I live in Larkfield off of Airport Blvd and I'm very concerned about the proposed KOI Casino. During the Tubbs Fire the roads were extremely congested when we tried to evacuate. We do not need more traffic congestion in this community.

I am opposed to this proposal and I hope that this does not happen.

John Kamola

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From: [Julie Neff](#)
To: [TribalAffairs](#)
Subject: Koi Casino
Date: Wednesday, June 15, 2022 12:56:28 PM

EXTERNAL

Dear Sir/Madam:

I would like to voice my opinion about the Koi Tribe Casino that is currently being discussed for the parcel of land just off Old Redwood Highway and adjacent to the town of Windsor.

I understand that the Indian tribes have a right to build on their native lands, but this is not their native land. This tribe has no significant connection to the land where they are proposing to build this casino.

We moved to Windsor 11 years ago because it was a family friendly community and surrounded by green spaces. This proposed casino is just too close to our Windsor neighborhoods to be comfortable for either.

In addition, can we really afford to provide water for a development of this size either from wells or from the river?

I most definitely oppose this development.

Julaine Neff
8578 Starr Rd
Windsor, CA 95492

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From: [Mary Stuart](#)
To: chad.broussard@bia.gov; [TribalAffairs](#)
Subject: KOI Nation Shiloh Resort and Casino Project
Date: Wednesday, June 15, 2022 9:43:09 PM

EXTERNAL

Dear Mr. Broussard: I have strong objections to the KOI proposed project for a casino to be located at the Shiloh Rd. adjacent to the town of Windsor. This is an area that does not need any large scale casino and/or resort. We already have two casinos within a 20 minute drive of this location. How can another possibly be sustainable? My concern includes traffic, which Shiloh Rd. can not accommodate, the agricultural nature of the surrounding area, access to our local regional park nearby on Westside Rd., as well the town of Windsor which sits right across from the designated site, and is already a busy residential and shopping destination for locals and tourists. There are playgrounds and neighborhoods directly in this vicinity that will be negatively impacted by such a project.

It would also be completely irresponsible to allow this project to move forward while we are experiencing the worst drought in decades, perhaps centuries. People in the nearby town of Healdsburg are already unable to satisfy their water needs. I am a long time resident of Sonoma County living in the west on the outskirts of Santa Rosa since 1985 and am frankly shocked at this proposal. The affect would be devastating, we stand to lose the character and scenic beauty of our county should this plan be allowed.

Further, it's my understanding that the KOI are not even a Sonoma County tribe. It's my opinion that they should not be permitted to encroach on our local tribal casinos.

Please reject this proposal. I request that my name and email address be added to all future mailings or announcements for this project.

Thank you for your attention to this matter.

Mary B. Stuart
4709 Guerneville Rd.
Santa Rosa, CA. 95401

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From: [Steve Karp](#)
To: chad.broussard@bia.gov
Cc: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Wednesday, June 15, 2022 1:46:00 PM

EXTERNAL

June 15, 2022

Mr. Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
chad.broussard@bia.gov

Mr. Steven Karp
5203 Vista Grande Drive
Larkfield, California 95403

Re: Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing to urge you to not allow the casino proposed by the Koi Nation to be built on the corner of Old Redwood Highway and Shilo Road. I live very near the proposed site and do not want to see our neighborhoods turned upside down by this project.

The reasons for my objection are many and seem obvious to anyone that analyzes this objectively. They include:

<!--[if !supportLists]--> <!--[endif]-->The site is bordered by residential homes in all directions who will be directly impacted by the increased traffic, noise, loss of safety for their families and reduction in home values.

<!--[if !supportLists]--> <!--[endif]-->There is a family park and ball field right across the street; Esposti park.

<!--[if !supportLists]--> <!--[endif]-->Increased Traffic on surface streets. Although Shilo is an exit off US 101 the casino is also off Redwood Highway and 1 block from Faught road. Both of these other roads are 2 lane country type roads which will be used as cut-through shortcuts. Faught Road goes right past the San Miguel Elementary School and will create nightmare scenario's for the school children with increased traffic rushing to the casino. Note that the solution is not to widen these roads. These were never meant to be anything but country roads and not freeway alternatives.

<!--[if !supportLists]--> <!--[endif]-->Increased crime is expected around any casino that attracts cash customers and unsavory people looking to get that cash. Police will often look for crime suspects that have recently robbed money at these casinos as

they fulfill their gambling fix.

<!--[if !supportLists]-->- <!--[endif]-->There are already two major casinos within 18 miles. Graton off 101 to the south 14 miles and River Rock off 101 to the north 18 miles. Sonoma County should not aim to become the "casino highway" of California. Graton has submitted plans to double the size of its casino/hotel/parking lot.

<!--[if !supportLists]-->- <!--[endif]-->The site location is not part of the Koi Nations historic land and therefore they should be given no extra consideration or allowance under any tribal treaty for locating a casino there.

Please, please do not let this project be built. If the Koi Nation wants to invest in something on this land then it should be something that is in keeping with the character of the neighborhood and Sonoma County. This could include developing housing with a community green area, establishing a winery since the land currently has commercial healthy grape vines on it, a boutique hotel that doesn't drive traffic levels through the roof, etc. Maximizing the Koi Nation profit with a casino should not be the driving factor here.

If Koi Nation is determined to build a casino, then I suggest that a more appropriate industrial location be found. There are similar size parcels located with the Santa Rosa Airport industrial park.

Thank you for your consideration and please do not let "donation politics" outweigh good common sense in turning this project down.

Sincerely,

Steven Karp

Cc: County Administrator's Office
tribalaffairs@sonoma-county.org

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From: [James Brooks](#)
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort
Date: Wednesday, June 15, 2022 11:23:35 AM

EXTERNAL

To Whom it May Concern,

There are only a couple of good reasons for this proposal: 1. Makes money for a small Indian tribe with no local affiliation and 2. Makes money for Casino interests who finance the operation.

There are a great many good reasons for not building a casino/resort here: 1. Hardly anybody who lives here wants it. The other reasons are detailed in all the other emails you've gotten. Some reasons are better than others but taken as a whole the arguments against the proposal vastly outweigh the arguments for it.

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From: [Donald Ziskin](#)
To: [TribalAffairs](#)
Cc: [don Ziskin](#)
Subject: Koi Shiloh Resort
Date: Wednesday, June 15, 2022 2:33:47 PM

EXTERNAL

Dear Sonoma County Board of Supervisors

I have been a resident of Oak Park in Windsor for the past 30 years. I predate the vineyard on the land where the Koi are proposing to build the casino resort. My children grew up playing in Pruitt Creek on the subject property. I am writing this letter in strong opposition to the Koi's proposed casino resort project. The area has grown significantly over the 30 years I have lived here. The infrastructure has reached capacity and is not capable of sustaining the volume of traffic at the proposed casino.

This is a relatively dense residential area with occasional vineyards schools, churches and small businesses. Nothing of the magnitude of the proposed casino sight. The idea of a huge casino, hotel, convention center complex drawing thousands of guests, employees, delivery drivers, vendors daily directly across the street from multiple neighborhoods and homes is totally inconsistent with the community.

East Shiloh Road at Old Redwood Highway starts with Esposti Park. This is also where the casino resort proposes to be located. Directly across the street. Heading east it is a single lane road ending at Shiloh Regional Park and the entrance to a housing community in the Mayacama mountains. It is frequented by bike riding clubs, walkers, and hikers. Esposti Park is home to boys and girls' sports leagues, adult sports leagues, dog walkers and more. The idea of Esposti Park and the neighborhood of Oak Park being across the street from the entrance/exit of this resort is overwhelming. Traffic control's will need to be installed to get in and out of Oak Park.

Congestion from all the visitors to the proposed resort will impact evacuation when the next fires strikes. There is no question there will be another! I have been through the Tubbs Fire and the Kincaid Fire and have been stuck in evacuating traffic both times. Having to share the road during an evacuation with the volume of people coming from the casino will be dangerous!

Aside from the foregoing public safety will also be affected. There is a likelihood of increased crime and injury from drunk drivers.

This project will also have a severe impact on local resources. Local residents are already on mandatory water rationing. This will impact local well users.

Other concerns include potential health problems from greenhouse gases, damage to roads/infrastructure, loss of open space/greenbelt, noise and light pollution, impact of ignoring zoning restrictions and declines in property values/marketability of home.

The construction phase of a project this big is also concerning. The equipment noise, vibration, dust and traffic disruption involving a sight this large will clearly impact quality of life and the local citizens well being as well as potential causing property damage.

We urge you to raise these issues in the scoping comments for the proposed Koi casino resort.

Don Ziskin
5862 Leona Court
Windsor

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From: [Curt Frederickson](#)
To: [TribalAffairs](#)
Subject: Koi tribe casino location
Date: Wednesday, June 15, 2022 12:05:08 PM

EXTERNAL

I have driven past the proposed location for the Koi tribe casino and I believe it is a bad idea.

- It is too far from the freeway. Who is going to pay to widen the roads to accommodate the increase in traffic? How many buses per day do you expect?
- It is next to existing, quiet neighborhoods full of voters. If you supervisors want to keep your jobs, you need to consider that.
- It is a small property considering the scope of the project. It will be an asphalt jungle. If it is not in a Scenic Resource zone, it is next to one and will destroy the esthetics of the area.

I am not fond of casinos, but at least put it in an area that is away from neighborhoods and close to a major road access.

By the way, the Koi tribe has no money for this and are simply a front for someone who has a lot. I bet that particular someone is not considering a location close to where THEY live... just saying.

Best regards,

C Frederickson

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From: sllkdl@comcast.net
To: [TribalAffairs](#)
Subject: Koi Tribe Casino Public Input
Date: Wednesday, June 15, 2022 8:34:19 PM

EXTERNAL

To Sonoma County Supervisors:

As a nearby long term homeowner living close to the proposed casino on Shiloh Road, we wish to provide our comments objecting to the casino for inclusion in the Notice of Preparation of Environmental Assessment/Tribal Environmental Impact Report. While we agree with tribal gaming as an option for tribal self-sufficiency, this location on Shiloh Road has many adverse environmental and qualification issues that cannot be overcome. While there is a litany of objections we could include, in the interest of brevity we would like to share our top two concerns.

Clearly the first issue is emergency evacuation. We live in Larkfield and have been trapped by traffic attempting to exit via Faught to Shiloh during the Tubbs Fire. We have evacuated twice in the last 5 years, and expect to be evacuated repeatedly in the years ahead. Installing a large facility that may be populated with over 10,000 people that will need to be added into any evacuation will clearly lead to loss of life. This is a location issue that is unfixable no matter how much road work improvement is done.

Our second point is there is no connection between the Koi tribe and Sonoma County. The tribe (like all other tribes who have opened casinos) should locate their casino within their traditional lands in Lake County. We have more than sufficient local tribal gaming in Sonoma County. The Koi tribe has an opportunity to turn this into a destination location in Lake County.

We are strongly against having a casino built in this residential area. To do so would impact so many of us that live in this area. Thank you for your consideration,

Stephen & Kathleen Lawrence
582 Coachlight Pl.
Santa Rosa, CA 95403

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From: [Mary Pope](#)
To: [TribalAffairs](#)
Subject: Koi tribe new proposed casino
Date: Wednesday, June 15, 2022 9:50:04 AM

EXTERNAL

Sent from my iPad

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From: [Morgan M](#)
To: [TribalAffairs](#)
Subject: KOO Nation Shiloh Resort
Date: Wednesday, June 15, 2022 7:03:57 PM

EXTERNAL

Dear Tribal Affairs Representative:

I am writing to state my opposition to the proposed Koi Nation Shiloh Resort and Casino Project. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo meaningful analysis of its effect with enough time for the public to meaningfully participate at each stage of the process.

After experiencing the drastic change in the Rohnert Park, CA, where I lived prior to the construction of the FIGR casino, I'm greatly concerned at the inevitable Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location. Many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Many families live in these neighborhoods, and many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, desire peace and quiet during the day.

Thank you for your consideration.

Dr. Morgan Marchbanks, EdD
Santa Rosa, CA 95403

Sent from Dr. Morgan's iPhone

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From: +17072926500@tmomail.net
To: [TribalAffairs](#)
Date: Wednesday, June 15, 2022 9:48:28 AM
Attachments: [text_0.txt](#)

EXTERNAL

Mi opinion on this matter is; That this project is not what we want our kids to grow around, it is too close to our schools and family homes and our community needs to grow with good values. There are enough bad thing going on already to add one more to our society. Please donâ€™t do this to our community. We need peace for our kids. Thanks.



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From: [Mary Pope](#)
To: [TribalAffairs](#)
Subject: New proposed Koi tribe casino, Windsor, Ca
Date: Wednesday, June 15, 2022 10:26:15 AM

EXTERNAL

Sent from my iPad

To whom it may concern:

My friends and I are totally against the Koi tribe casino or any other casinos being built in this community.

We feel there are already too many casinos nearby.

Actually, the impact would be absolutely devastating for our community.

We are already conserving water and the drought is continuing to worsen.

We feel this is a negative impact on our young people and basically everyone. We do not need or want any casinos in or near Windsor.

Our infrastructure, roads, traffic, parking, noise and our property values will suffer drastically.

Actually, we believe every family in Windsor will be negatively impacted.

We are strongly opposed to this casino being built in or near our community.

Please, we absolutely reject the building of this casino.

Thank you.

Mary Pope

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From: [jane frye](#)
To: [TribalAffairs](#)
Subject: No Casino in our beautiful neighborhoods!
Date: Wednesday, June 15, 2022 11:53:25 AM

EXTERNAL

To whom it may concern,

My name is Jane Frye. I am a kindergarten teacher for the Mark West Union School District and I as well live in the Wikiup neighborhood.

The idea that a casino is going to possibly be built in the middle of our small town(s) is absolutely ludicrous! Were you in the Larkfield-Wikiup area when the Tubbs Fire touched down into the community and all had to evacuate at the same time? I am going to assume that's a "no" because if you understood the traffic that night that involved flames surrounding cars with people and families in them then you wouldn't even consider building a casino in an area that doesn't have a safe infrastructure to support more growth.

As a teacher in the community and as well a neighborhood resident this plan is unacceptable. Why in the world would want to put a venue such as you're wanting to build. right. in. the. middle. of a community.

Our community needs diversity, but not in the form of a casino, hotel, and whatever else you have planned.

How about building a museum with natural gardens to educate people on our 1st people? It would be a great place for families, field trips, and for out of town visitors. The Wintu Cultural Museum is an amazing place to visit in Northern California! Think about what the Koi Nation needs and what the rest of the community needs too not just the Koi's. Again it is NOT a casino!

This casino proposal must be reconsidered immediately as not only is your tribe part of the community, but also are the rest of the residents regardless of race, culture, and socioeconomic status.

Put your casino in an area that is not going to negatively affect life. We will have crime, congestion, drunk drivers, and property values will go down significantly because who wants a casino in their backyard! Not us here in Larkfield-Wikiup and in Windsor as well.

Thank you for your time,

Jane Frye

Sent from my iPhone

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From: [Kat Slusser](#)
To: [TribalAffairs](#)
Subject: NO CASINO
Date: Wednesday, June 15, 2022 8:26:45 AM

EXTERNAL

Hello, this is Dr. Kat Slusser. Please add my name to the long list of residents who are vehemently opposed to a new casino in Windsor. You already know all the reasons why.

Thank you,
Dr. Kat Slusser, PhD, RN
907 Indiana Ave
Windsor, CA 95492
(707) 291-1652 Cell
KatherineSlusserRN@gmail.com

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From: [Laurel Jew](#)
To: [TribalAffairs](#)
Subject: NO on new casino
Date: Wednesday, June 15, 2022 11:07:37 AM

EXTERNAL

While I realize there is a profit motive here for the tribes (and we all know that part of the profits will go to a tribe far far away who are managing the project), I do not think Sonoma County needs or can sustain another casino. I am very strongly against this project for the following reasons:

- Wildfire Risk -- the area is less than a mile from rural area and regional parks that burned in 2017, 2019, and were at risk in 2020.
- Proximity to Residential Neighborhood, Churches, Schools - The excess traffic, noise, and lighting issues on one-lane roads and next to residential neighborhoods present a serious risk and nuisance. There is a reason the Board of Supervisors oppose this development.
- Loss of Open Space/Greenbelt -- Why give up greenspace for traffic, noise, and gambling addictions with all their related problems (crime, broken families, alcohol abuse)? All those toilets flushing will end up using a lot more water than the land does now. Once you develop that land it's gone forever. Don't do it.
- This is not historically Koi tribal land -- They bought it just for a casino, strictly for commercial purposes and profit. And much of the money will be going to a much larger tribe in Oklahoma that is going to manage the project. So most of the \$\$ will not benefit Sonoma County anyway.
- Emergency Response -- Casinos mean more crime and Sheriff response times are already a challenge for unincorporated areas. That's not to mention the additional burden on other support services from those who overspend and hurt themselves and their families. Please say no to more crime.
- There are so many reasons I do NOT want a casino a mile from my house!!!

--

Laurel Jew
Larkfield resident

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From: [Cathy Brooks](#)
To: [TribalAffairs](#)
Subject: No on proposed casino
Date: Wednesday, June 15, 2022 10:53:56 AM

EXTERNAL

Please do whatever you can to stop the casino project on OLH and Shiloh. We need more green space, not less. We don't have enough water as it is. Traffic can be a mess.

Thank you.
Cathy Brooks
Windsor

Sent from my iPad

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From: [r.reid](#)
To: [TribalAffairs](#)
Subject: NO ON WINDSOR CASINO
Date: Wednesday, June 15, 2022 8:12:07 AM

EXTERNAL

County of Sonoma-

This email is in opposition to the contemplated casino being built in Windsor. We already have enough problems with water rationing, crime, and traffic congestion. We don't need another casino.

Also, what did the casinos really do for the public when the fires of 2017 first hit?

Thank you.

Robin Reid

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From: [Marit Barca](#)
To: [TribalAffairs](#)
Subject: Not another casino
Date: Wednesday, June 15, 2022 4:12:49 PM

EXTERNAL

As a 20 plus year resident of Windsor, I strenuously object to the addition of another casino in the area.

First concern: We do not have enough water to support local residents plus our traditional agriculture without severe rationing. It makes zero sense to build a large entertainment center that will consume many times what private residences would use.

Second concern: Wild fire risk and escape routes. We already have experienced how time consuming and nerve wracking it is to try to flee on our two major roads with existing levels of population. When there are events at Kaiser Park, such as the fireworks for 3. July, my guest have to stay 2 hours after event is over before they can get out of the neighborhood. This is minor compared to the planned numbers of people at the new casino!! The town roads cannot accommodate this.

Third concern: Most of us moved to Windsor for the small town feel and the sense of community. The casino will destroy that sense of safety and knowing your neighbors. It does bring crime and people who have zero investment in our the quality of daily life.

Please do not approve this casino!!

Thank you.

Marit Barca

Sent from my iPhone

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From: [Susan Markcity-Bernard](#)
To: [TribalAffairs](#)
Subject: Not in favor of the proposed casino development
Date: Wednesday, June 15, 2022 8:08:01 AM

EXTERNAL

[This is the worst thing that could happen to my neighborhood.](#)

The proposed plan includes a 200 room hotel, six restaurants, a conference center, a spa and a casino on the 68 acre parcel. This is a smaller piece of land, but the project is expected to be larger than the Graton Casino, which is on a larger parcel. Graton has approximately 10 million visitors a year. That is approximately 20,000+ visitors a day. Shiloh Road/Old Redwood Highway and Hwy 101 cannot handle that influx of traffic. Plus, the parcel of land is surrounded by neighborhoods, churches, schools, parks.

As a resident of Esposti Park, near Merner and ORHighway and the proposed casino, I am adamantly opposed to this plan. Further grave concerns listed below:

Wildfire Risk · Proximity to Residential Neighborhood, Churches, Schools · Infrastructure Roads · Loss of Open Space/Greenbelt · Negative Ecological Impact · Noise · Drought/Water Availability/Mandatory Water Rationing · Impact of Ignoring Zoning Restrictions · Public Safety · Quality of Neighborhood Activities · No Significant Connection to the land by the Koi Tribe · Emergency Response Time · Greenhouse Gases · Decline in Property Values

Sincerely
Edward and Susan Bernard

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From: [Terry Lenhardt](#)
To: [TribalAffairs](#)
Subject: Objection to proposed casino location
Date: Wednesday, June 15, 2022 2:37:43 PM

EXTERNAL

My county representative,

I oppose this casino location as it will impact negatively these issues:

Open space

Traffic

Water use

Energy use

Crime

Noise

Infrastructure

Property values

I ask you to not approve this project.

Regards,

Terry Lenhardt

589 Shagbark St.

Windsor, CA 95492

Sent from my iPhone

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From: [Dianne L Anderson](#)
To: [TribalAffairs](#)
Subject: Opposition to any more casinos
Date: Wednesday, June 15, 2022 12:55:45 PM

EXTERNAL

I strongly oppose this proposed project—no more casinos, please!!

· Wildfire Risk · Proximity to Residential Neighborhood, Churches, Schools · Infrastructure Roads · Loss of Open Space/Greenbelt · Negative Ecological Impact · Noise · Drought/Water Availability/Mandatory Water Rationing · Impact of Ignoring Zoning Restrictions · Public Safety · Quality of Neighborhood Activities · No Significant Connection to the land by the Koi Tribe · Emergency Response Time · Greenhouse Gases · Decline in Property Values

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From: [Maria Nersesian](#)
To: [TribalAffairs](#)
Subject: Opposition to Koi Tribe Indian Casino on Shiloh Rd in Santa Rosa
Date: Wednesday, June 15, 2022 8:54:43 AM

EXTERNAL

I write to express my strong opposition to the proposed casino site on Shiloh Road in Santa Rosa. The proposed site is in a residential neighborhood with schools and parks nearby, without adequate roadway infrastructure and also a high wildfire risk area. I feel it presents a danger to the community for these reasons, among others, including the decline to property values in these neighborhoods.

I am not opposed to the Koi Tribe's right to build a casino in a suitable location. I feel this particular location is not suitable. A less developed residential neighborhood, that is not located next to an extremely high wildfire risk area is a better alternative.

Sincerely,
Maria Nersesian
5865 Cottage Ridge Road
Santa Rosa, CA 95403

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From: [Barbara Collin](#)
To: [TribalAffairs](#)
Subject: Opposition to Shiloh Casino proposal
Date: Wednesday, June 15, 2022 4:43:53 PM

EXTERNAL

I strongly oppose the proposed casino off Shiloh Road. We have MORE than enough casinos in this county as it is BUT to have one in the middle of a residential neighborhood is unconscionable! Traffic, noise pollution, light pollution, crime, water, fire risks, devalued property are only a FEW of the issues this will cause.

Please, NO more casinos. Enough is enough!!!!

Barbara Collin
224 Lea Street
Windsor Ca 95492

Sent from my iPad

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From: [Lene Vallelunga](#)
To: [TribalAffairs](#)
Subject: Please consider!
Date: Wednesday, June 15, 2022 5:22:50 PM

EXTERNAL

As a Sonoma County resident, I vehemently oppose a Casino Resort on East Shiloh Road. This is an inappropriate location for a 24 hour business that includes a 200 room hotel, six restaurants, conference center, spa and a casino. The 68 acre parcel is surrounded by a number of quiet neighborhoods, churches, schools, parks and a community who enjoys the outdoor activities.

I strongly urge that the Sonoma County Board of Supervisors support our concerns:

Lene Vallelunga

... FIRE SAFETY & HUMAN LIFE: We have a history of deadly fires. The evacuation of an additional 20,000 plus, casino customers is a recipe for disaster. There is no safe way of evacuating this amount of people from this particular area, without increasing the risk of death.

...WATER SHORTAGE/DROUGHT: Sonoma County residents are being asked to conserve water. Many of us are taking fewer showers, not watering our lawns or flushing our toilets often. Lack of water for a business that invites over 20,000 people a day puts too great a water burden on the people in the area.

There are many concerns that go well beyond the above that include increased crime, drunk driving, increase of noise, lighting and traffic, devaluation of our property. The loss of the fire break of the vineyards would be detrimental as they saved homes during the last fires.

This is the WRONG LOCATION for a business operation of this size.

Sincerely,
Lene Vallelunga

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From: [Jill Plamann](#)
To: [TribalAffairs](#)
Subject: Please do not install the Koi Casino
Date: Wednesday, June 15, 2022 6:42:08 AM

EXTERNAL

Please do not place a casino on the property at Shiloh Road in Windsor, California. This is a location directly across the street from a large residential neighborhood. There is not nearly enough water and it is directly in the path of a wildfire danger zone.

The Casino will not be welcome here. That's a shame because I truly believe members of all Native (original peoples) should be highly respected and they have much for more to offer than to be represented by a casino.

Thank you for your consideration,
Jill Plamann
112 Anna Drive
Windsor, California. 95492

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From: [josh hammer](#)
To: [TribalAffairs](#)
Subject: Please no casino
Date: Wednesday, June 15, 2022 4:51:53 PM

EXTERNAL

To whom it may concern,

I would like to strongly oppose the proposed casino off of Shiloh Rd. There are already several casinos in Sonoma County and no more are needed. This will negatively impact the peace of our local neighborhood due to increased noise, traffic, water usage, and public safety. Also, we don't need another casino that is taking people's hard earned money and losing it when they don't have the restraint. This will be one more location that is taking advantage of those with gambling addictions. An extra casino is definitely not what Sonoma County needs.

Please vote no on this newly proposed casino.

Thanks,

Josh Hammer

Resident of Wikiup Neighborhood, Santa Rosa

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From: [John Birkedal](#)
To: [TribalAffairs](#)
Subject: proposed casino location
Date: Wednesday, June 15, 2022 9:49:41 AM

EXTERNAL

Please let it be known that I am opposed to the proposed location of the casino by the KOI tribe I live near the location and the last thing we need is a huge casino here, the traffic in the area is already horrible, it will take away from the open space, the noise and pollution will be worse, there is no connection to the KOI tribe in this area, it's near residential areas and will lower property values, I enjoy hiking in Shilo regional park and enjoy the views of a firly peaceful area, PLEASE NO CASINO ,NO CASINO
John Birkedal

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From: [Debra](#)
To: [TribalAffairs](#)
Subject: proposed casino on E Shiloh Rd. Santa Rosa
Date: Wednesday, June 15, 2022 5:53:07 PM

EXTERNAL

To: County of Sonoma - Tribal Affairs

I am writing to express my significant concerns regarding the proposed Koi Nation casino and hotel on E Shiloh Rd. in northeast Santa Rosa.

I am a resident who lives directly across from the proposed site. Its hard to imagine a more inappropriate site for a casino. There are so many concerns and reasons to oppose this venture but I will try to be concise.

First, this land area is zoned rural /residential /agricultural. I have lived at 127 E Shiloh Rd Santa Rosa for 32 years and most of my neighbors have been here longer. Many changes have occurred but that is the way life is. But a casino, and all that it brings, is barely better than an oil refinery. The Koi Nation chose unwisely to purchase the acreage and vineyards here. It doesn't take much to realize this is anything but a good fit for gambling, hoopla and increased traffic.

Secondly, and obviously, this is a high fire area, and having had to evacuate twice for fires in the last 5 years, I can attest to the traffic snarls that occurred. Adding hundreds or thousands of cars and people to a crisis situation is untenable.

Thirdly, where is the water to sustain this venture going to come from? I have a well and am very careful with only flushing toilets when needed, I divert washing machine water to my garden and trees already. Rich people taking long showers and restaurants washing everything, I mean, I just can't even...

Fourth, my grandkids live in Larkfield and go to Mark West School. No one wants their kids to be exposed to the scene around a casino and drinking. They are safe riding their bikes around the neighborhood now but that will be a thing of the past. Public safety here would be significantly affected negatively, residual crime is a byproduct of casino behavior.

Fifth, Shiloh Regional Park is **directly** east of this site. The County Regional Parks are gems and should be respected for what they add to the community. The views from the park west are amazing. The casino would completely change the experience for park users and disrupt the wildlife that lives there. Esposti Park soccer and baseball fields are directly adjacent to the north corner of this proposed site. Kids play there regularly and people walk their dogs.

Sixth- Environmental issues, greenhouse gas emissions, noise and light pollution, riparian corridor (creek runs right through this property).

Seventh and lastly (I could go on) My ancestors in upstate New York where I am from, were part of the Iroquois Confederacy, Oneida Nation. I know Native Americans have been stripped of their rightful land and treated poorly for centuries. Reparations need to be made. However, this site in Sonoma County is not a part of the Koi Nation history. They should be given the chance to resettle near their ancestral lands in Lake County, and helped in this endeavor.

No, it just does not make sense to plop a large casino and hotel and restaurants into the middle of a scenic, rural, residential area.

Respectfully submitted,

Debra Avanche
127 E Shiloh Rd
Santa Rosa CA

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Respectfully submitted,

Debra Avanche
127 E Shiloh Rd
Santa Rosa CA

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From: [Karla Ravandi](#)
To: [TribalAffairs](#)
Subject: Proposed Casino Site
Date: Wednesday, June 15, 2022 10:47:36 AM

EXTERNAL

Dear Tribal Affairs Committee Members,

As a new homeowner within the community, I am completely opposed to the idea of a casino being built within blocks from the entrance to my home.

Not only do I have concerns about the immediate issue of water conservation and road infrastructure, I also believe that mine and my neighbor's property values will be impacted due to concerns about safety, noise, and the long-term environmental impact this proposed project will have in the area.

Thank you for your kind attention to this matter.

--

Karla Ravandi
1110 Cottage Valley Ln, Santa Rosa, CA 95403
Cell - 310.930.4549

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From: [Janet Rustigan](#)
To: [TribalAffairs](#)
Subject: Proposed Casino Site
Date: Wednesday, June 15, 2022 11:29:40 PM

EXTERNAL

NO. NO MORE CASINOS.

The proposed site is inappropriate to a large commercial development. The nature and volume of traffic it will impose on the access routes and the surrounding neighborhood is only one standout argument among many why such a project should not be considered in the first place. It's abhorrent.

Sent from my iPhone

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From: [Kathy Howard](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Wednesday, June 15, 2022 5:25:13 AM

EXTERNAL

I am writing to voice my opposition to the proposed casino on Faught Road in WindsorCA. I do not believe the community can support the infrastructure between water usage and traffic. Our community has endured two major fires with loss of homes and businesses. Poor air quality air quality from the fires and COVID have made life difficult for all. I believe the casino would only contribute to substandard quality of life for the existing residents and if one wants to dine and gamble the casino in Rohnert Park Is easy and accessible. The Graton Ramcheria should not be in competition with another tribe that is not native to this land.

Very truly yours,
Kathryn Howard

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From: [Kathi](#)
To: [TribalAffairs](#)
Subject: Proposed casino
Date: Wednesday, June 15, 2022 8:36:31 AM

EXTERNAL

Sonoma County,

I am sending this email in regards to the proposed casino @ Shilo+ Old Redwood Hwy. Sonoma county does not need another casino.! This is a neighborhood. I just moved here for the peaceful lifestyle. A casino would take that away. A casino would bring too much traffic congestion; the roads are not equipped for all the traffic. We are having a drought; a casino would use way too much of our water. A casino would wreak havoc if a fire occurred. Sonoma county does not need another casino. Do not build one!

Sincerely
Kathi Higgins

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From: [Gay Fahrner](#)
To: [TribalAffairs](#)
Subject: Proposed casino
Date: Wednesday, June 15, 2022 11:51:32 AM

EXTERNAL

Sonoma County does not need any more casino type developments!!!
Especially any near existing neighborhoods. Recovery now from our
recent pandemic years must be our first priority,
NO MORE CASINOS!!!!
Gay L. Fahrner, Santa Rosa CA

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From: [Martha Clark](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Wednesday, June 15, 2022 2:16:09 PM

EXTERNAL

Please add my name to those opposed to the proposed casino by the Koi tribe. Sonoma County does not need a third casino. A casino has no place in residential neighborhoods or in close proximity to schools. I feel this casino will greatly devalue the property values of nearby homes, not to mention the increased useage of water, already so scarce in the county. The increase in area traffic and the loss of the scenic vineyard will be a detriment not only the area near and around Windsor, but to the entire county. Lastly, the Koi tribe has no direct connection to the land involved. Please do all you can to stop the building of this casino.

Martha L. Clark
526 Juniper Lane
Windsor, CA 95492

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From: [Pamela Geiss](#)
To: [TribalAffairs](#)
Cc: [district4](#)
Subject: Proposed casino
Date: Wednesday, June 15, 2022 3:35:51 PM

EXTERNAL

To Whom It May Concern:

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 30+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, the Town of Windsor will be most seriously impacted - again NOT in a positive manner. More cars, more crime, increased public safety expenses without the benefit of increased revenues (the casino is actually in Santa Rosa vs. Windsor). When we all evacuated three years ago, the roads were clogged and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose this building of this casino.
Thank you,
Pamela Geiss
707-838-7403

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From: [Michael Higgins](#)
To: [TribalAffairs](#)
Subject: Proposed Koi Nation Casino at Shiloh Rd and Old Redwood Hwy
Date: Wednesday, June 15, 2022 2:35:14 PM

EXTERNAL

To whom it may concern,

I strongly oppose this development.

- This will lead to a dramatic increase in vehicular traffic in an already stressed infrastructure while negatively affecting the environment with vehicle pollution and noise.
- Not only will people visit the casino, this project will require a large staff that will largely come from outside the community, further overtaxing the infrastructure.
- There are residential areas next to and nearby this area. This will cause a negative effect on property values and the quality of the neighborhoods.
- The increase in traffic and number of people in and around this site will invite an increase in crime greatly affecting public safety.
- We are in an era of increasing drought. This site will exacerbate the problem by drawing more resources and depleting the ground water further.
- This will impact wildfire response in that many more people not prepared for it will have to be evacuated and clog evacuation routes.
- The increase in noise pollution will be detrimental to the residents of the area.
- There will be added pressure on our already depleted First Responders impacting response times for all in the area.
- The Koi Nation has no legacy connection to this site.
- Sonoma County already has enough casinos, more are not needed.

This is bad for Windsor, bad for Santa Rosa and bad for Sonoma County.

Sincerely,

Michael Higgins

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From: [Glen Stanley](#)
To: [TribalAffairs](#)
Subject: Proposed Koi Tribe Casino
Date: Wednesday, June 15, 2022 8:43:03 PM

EXTERNAL

To whom it may concern,

I am writing to voice our strong opposition to the proposed Koi Tribe casino targeted for Shilo Rd and Old Redwood Highway. I live approximately 1.5 miles from the project and believe it would materially decrease the quality of life in our area due to increased traffic, light/noise pollution, public safety concerns, and a terrible fit for a rural and residential neighborhood. Additionally there would be tremendous demands on ground water and/or local water systems that are already stressed to the breaking point due to drought and population growth.

This project cannot and should not be allowed.

Sincerely,

Glen & Dorinda Stanley
5415 Arnica Way
Santa Rosa CA 95403

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From: [Laurel DeBello](#)
To: [TribalAffairs](#)
Subject: Proposed new Casino in Larkfield/Windsor.
Date: Wednesday, June 15, 2022 8:27:46 AM

EXTERNAL

I am wholeheartedly opposed to the new proposed Casino.
It's going to ruin the tranquility and safety of the neighborhood.
Too much traffic will decrease safety of walking in this neighborhood.
There will be more alcoholics and drug addicts driving the area.
It will draw people from all areas who don't appreciate nor respect the peacefulness of the area.
It will draw folks from Gangs from all areas, just like Graton Casino.
There will be two years at least before the area will be finished with being a construction zone.
Considering the effects from our previous five years of devastating fires and rebuilds, this seems mean.
NO ONE WANTS THIS TO BE BUILT. IT WILL DESTROY THIS AREA.

Thank You,
Laurel DeBello
Sonoma County Long term resident

[Sent from Yahoo Mail on Android](#)

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From: srohlen@icloud.com
To: [TribalAffairs](#)
Subject: Proposed
Date: Wednesday, June 15, 2022 9:06:42 PM

EXTERNAL

I object to the proposed casino being built on Shiloh Road and have signed a petition to prevent this project.

Shelagh Rohlen
6250 Acorn Hill Lane
Santa Rosa, CA 95403

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From: [Elizabeth Acosta](#)
To: [TribalAffairs](#)
Subject: Public Comment: Koi Tribe Environmental Assessment
Date: Wednesday, June 15, 2022 12:14:56 PM

EXTERNAL

Sent via email to: tribalaffairs@sonoma-county.org

Please note: please redact our email address prior to publishing this letter on the internet, if needed or required.

We wish to join neighbors and native peoples residing in Sonoma County to express OPPOSITION to any and all efforts by the Koi Nation, a federally-recognized Native American tribe, to have land in an unincorporated area of Sonoma County taken into trust for the Koi Nation in order to build a massive casino resort adjacent to a residential neighborhood and just beyond the boundaries of the Town of Windsor.

While we understand the need and intent of federal laws designed to recognize and protect the sovereignty of indigenous people, we are strongly opposed to the Koi nation's intentions for the entrusted land they seek. Sonoma County is too small a county to add another Vegas-style casino; it will have a detrimental impact on surrounding neighborhoods, have significant negative environmental impacts on the area especially given the recent history and ongoing risk of wildfires and drought in Sonoma County. Climate change effects are stressed to us constantly by our political leadership. How can a development of this size—which invites overuse of natural resources like water, stresses the local infrastructure designed for agricultural and low-density residential use, and increases the demands of public services like fire, police, public works—be sanctioned?

We believe a 24/7 casino is not a good “fit” for this Sonoma County agricultural and residential neighborhood.

Most concerning is what appears to be Koi nation's attempt at “reservation shopping,” according to the Chairman of Sonoma County's Federated Indians of Graton Rancheria, Greg Sarris. In his statement opposing their intentions, chairman Sarris recounting of the Koi nation's history and intentions are both frustrating and enlightening:

- “The consensus among ethnohistorians is that the Koi Nation's ancestral roots are in the Lower Lake area of Lake County. In fact, the Koi Nation was previously known as ‘Lower Lake Rancheria,’ a reflection of its geographic and cultural ties to the area, but changed its name in 2012, amid prior attempts to acquire a gaming site in the Bay Area.”
- “The Koi Nation has never been associated with Sonoma County, linguistically or culturally, as a people indigenous to its landscape. The Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here.”
- “The Koi Nation's attempt to push through a proposal to jump into other tribes' territory is wrong. Moreover, this is not the Koi Nation's first attempt at reservation shopping. In the early 2000s, the Koi Nation unsuccessfully attempted to acquire a reservation and build a casino near the Oakland International Airport. Then in 2014, the Koi Nation proposed a reservation and casino on Mare Island in the City of Vallejo, again failing.”
- “This effort ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game.”

We have many other concerns that pose a significant risk to the altering the local neighborhood and living conditions, including:

- **Loss of Open Space/Greenbelt and Wildfire Risk:** this location is on land that is on the urban/wild interface and will remove agricultural land that helps form a fire “boundary” around the neighborhood that can help slow or inhibit spread of embers that increase wildfire risk. The area has already been threatened by at least two wildfires in 5 years.
- **Proximity to Residential Neighborhood, Churches, Schools:** the activities that will occur at a 24/7 casino are not conducive to residential zoned areas which are adjacent to the proposed entrusted land. Residential areas are designed to create an environment that seeks to decrease noise, traffic, vehicle/pedestrian contacts that make the areas safe for all ages, esp. youth and the elderly that use sidewalks to recreate and travel.
- **Infrastructure Roads:** the area is designed for residential uses; roads and other infrastructure were not designed for the projected daily visitors. The ability of the Town of Windsor to absorb impacts of traffic/vehicle accidents, crime, medical emergencies, etc. due to the high volume of tourists expected, and concentrated on the property, will greatly outstrip resources of the small town of Windsor which is already facing a structural deficit in funding basic public safety, public works, and traffic management services.
- **Negative Ecological Impact:** given the proximity to open space and a County regional park, the impact on the natural environment due to light pollution, noise, traffic, greenhouse gas emissions, and water use cannot be mitigated given the projected trips/use by visitors to the casino. These same negative impacts are not conducive to adjacent residential living.
- **Drought/Water Availability/Mandatory Water Rationing:** given climate change and the resulting record setting heat and increased wildfires which are exacerbated by years-long drought pose serious threats to the local environment and residents who are already experiencing mandatory water rationing. The water needed to service the proposed development puts increased stress on unpredictable and diminishing water resources. A development like this undermines the local governments’ ability to create coordinated and thoughtful development plans that consider natural resources. A development such as this on land that is taken into trust removes any influence of local governments to control and manage natural resources.
- **Impact of Ignoring Zoning Restrictions/Land use:** we join the Town of Windsor’s expression of formal opposition to the Koi nation proposal at 222 E. Shiloh Rd. The Town has shown support for other local tribal developments in or around the Town of Windsor but finds that this Koi nation proposal is inconsistent with current land use designations.
- **Public Safety/Emergency Response Time:** The land at issue is in an unincorporated area of Sonoma County but immediately adjacent to the Town of Windsor boundary. In an emergency, resources and mutual aid will likely be sourced from the Town. The Town is unable to fund an increased need for services that attract a large, concentrated number of visitors much like what has occurred in coastal communities whose emergency response services are used mostly by tourists to the financial detriment and burden of local residents.
- **Greenhouse Gases:** our local, state, and federal governments consistently stress the impacts of climate change brought on by greenhouse gases and CO₂ emissions and strive to institute policy, laws, and regulations that minimize impacts while providing incentive for new human behaviors that decrease impacts. A large development that will dramatically increase the impacts of humans on this agricultural space will exacerbate existing impacts of climate change that cannot be easily reversed i.e., drought and mandatory water rationing, record heat and wind that increases wildfires. Approval of this project by a federal agency is

counterintuitive and counterproductive to the Biden administration's goals for reducing impacts of climate change.

- Housing/Homelessness: the need to employ people at a 24/7 casino operation may be touted as a great job creator but housing needed for casino workers only exacerbates current demands for housing, which is already stressed. A recent report stating homelessness has increased 5% in Sonoma County highlights the current unmet need for housing. Housing stock is inadequate and the cost is likely out of reach for the average pay of a casino worker. If casino workers choose to commute from surrounding areas because of a lack of local housing, the impacts of traffic, noise, inadequate infrastructure, and climate change already noted will worsen.

For all the reasons stated above, we join our neighbors, local residents, and local native tribes in opposing the (non-Sonoma County native) Koi Nation's proposal to have land taken into Trust in order to build a resort-style casino. Thank you for the opportunity to comment.

Regards,

Elizabeth Acosta & Stephen Rios, Residents
Windsor, Sonoma County (CA)

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From: [Ron Calloway](#)
To: [TribalAffairs](#)
Subject: RE: Mark West Superintendent disapproval of Koi Nation Shiloh Casino
Date: Wednesday, June 15, 2022 4:01:49 PM

EXTERNAL

As of June 9, 2022, I am officially retired from the Mark West District. Please email Alicia Mills: amills@mwusd.org for any requests for information.

--

Ron Calloway

Superintendent
Mark West Union School District
305 Mark West Springs Road
Santa Rosa, CA 95404
(707) 524-2970 phone
(707) 524-2976 fax

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From: [Mark Kimmel](#)
To: [TribalAffairs](#)
Subject: Re: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 12:45:24 PM

EXTERNAL

PLEASE CONSIDER THE FOLLOWING CONCERNS AND ENVIRONMENTAL HARMS:

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- NOISE 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT
- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;
- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS
- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF
- GROUND WATER AND WELLS
- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE
- LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

Thank you.

Mark Kimmel
740 Shiloh Terrace
Santa Rosa CA, 95403

925-997-9299

On Jun 15, 2022, at 12:44 PM, Mark Kimmel <kimmel@lmi.net> wrote:

REJECT SHILOH CASINO RESORT!!!

Mark Kimmel
740 Shiloh Terrace
Santa Rosa CA, 95403

925-997-9299

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From: [Sandie](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 12:00:51 PM

EXTERNAL

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From: [Isabella Pici Dottavio](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 12:15:53 PM

EXTERNAL

On behalf of the residents in the Shiloh Community, im going to list some of the reason I reject the Shiloh Casino Resort

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF GROUND WATER AND WELLS

For these reason I strongly discourage the building of this casino

-Bella

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From: [Mark Kimmel](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 12:44:29 PM

EXTERNAL

REJECT SHILOH CASINO RESORT!!!

Mark Kimmel
740 Shiloh Terrace
Santa Rosa CA, 95403

925-997-9299

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From: [Kenneth Pietrelli](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 1:56:51 PM

EXTERNAL

Gentlemen,

I strongly oppose the proposed Casino near the intersection of Old Redwood Highway and Shiloh Road.

The primary objection is that the existing infrastructure, especially the interchange at Highway 101 with an overpass that can only handle one lane of traffic in either direction is **UNDERSIZED** for the existing traffic patterns which experience backups. Adding yet more traffic for the proposed destination would totally overwhelm the existing infrastructure, especially the Shiloh Road interchange and overpass at Highway 101. The feeder roads of Shiloh and Old Redwood Highway would also be seriously undersized for the increase in traffic.

This would be a disastrous safety issue during any natural disasters such as a wildfire.

This proposal should be unacceptable to anyone responsible for public safety.

Separately, who would pay for a new interchange at Shiloh Road and widening Shiloh Road and Old Redwood Highway? We the taxpayers shouldn't have to pay for this expense. Rather the developer of the proposed Casino should have to pay for these expensive infrastructure upgrades and complete them before opening a Casino. Has the Indian Tribe proposing the new Casino committed to funding these expenditures? If not, they should be required to commit to this funding before a final decision is made.

Kenneth Pietrelli
4873 Hoen Avenue
Santa Rosa, CA 95405

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From: [Judi Pietrelli](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT
Date: Wednesday, June 15, 2022 3:00:20 PM

EXTERNAL

Please, please reject the proposed casino at Old Redwood Highway and Shiloh Roads. The public's safety and the damage to the environment and community -- which we know is absolutely inevitable -- is too high a price to pay for a gambling casino.

Judith Pietrelli
4873 Hoen Avenue
Santa Rosa, CA 95405

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From: [Michael Mayer](#)
To: [TribalAffairs](#)
Subject: Reject Shiloh Casino Resort
Date: Wednesday, June 15, 2022 5:56:59 PM

EXTERNAL

There are many compelling reasons for you to reject the proposed Shiloh Casino Resort, including:

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- NOISE 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT
- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;
- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS
- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF **GROUNDWATER** AND WELLS
- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE

Thank you.

Michael & Kathi Mayer

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From: [Lynne Carpenter](#)
To: [TribalAffairs](#)
Subject: Shilo Casino
Date: Wednesday, June 15, 2022 8:25:07 PM

EXTERNAL

To whom it may concern:

I am a Larkfield resident. I vehemently oppose the Shilo Casino for many reasons; chief of which are the following:

This is a rural, residential area; with schools and parks in close proximity to this proposed site. Not an appropriate place for a casino.

The access roads to the proposed sites are two lane and in some areas very narrow. This will create significant traffic issues.

This site is an area known for fire and evacuations. This would compromise the safety of residents as the two lane streets become overwhelmed with traffic.

We are in the middle of a historic drought that shows no signs of stopping. The last thing we need is 1.5 million sq ft of commercial space and Hotel rooms strapping already limited resources. How can I be expected to use 20% less water when a project, that will use millions of gallons of water every month, is built 1/2 a mile away?

This is open area, there will be environmental impact from developing this site.

There are many more things that make this a horrible project, however I will end with this; I understand that the Koi Nation has no significant connection to the land in Sonoma County. I believe that they are a very small tribe that has been "shopping" casinos for several years and tried this in Sacramento unsuccessfully.

Thank you for your attention to this matter. Please do all you can to preserve our community.

Lynne Caroenter
5374 Arnica Way

Typos courtesy of my iPhone

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From: christopher.handel@yahoo.com
To: [TribalAffairs](#)
Subject: Shiloh Road vineyard site
Date: Wednesday, June 15, 2022 11:05:19 AM

EXTERNAL

We are opposed to locating a casino resort complex on this site.
It is inconsistent with the county plan supported by the voters.
Chris and Nancy Handel
Larkfield, CA

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From: [Elizabeth Pulcheon](#)
To: [TribalAffairs](#)
Subject: Strongly opposed to proposed casino in Windsor
Date: Wednesday, June 15, 2022 3:44:25 PM

EXTERNAL

Sonoma County Representatives:

I would like to express my STRONG opposition to the proposed casino in Windsor (Shiloh Road). The proposed location is in close proximity to residential neighborhoods, schools and churches. I do not believe this is an appropriate location nor is there the infrastructure in place to support a casino and the amount of traffic it will create.

The loss of open space is another big negative for me. The ecological impact on what is a green belt zoned for agriculture and vineyards will be significant and will destroy any balance that currently exists. Would the current zoning simply be ignored in an effort to push through a casino???

California is in a historic drought with very limited resources in area. We all know too well the susceptibility to out of control wildfires. Limited water availability has already caused severe issues in the area.

I am not opposed to casinos and understand the rights of tribes to build, but the Koi Tribe does not have a significant connection to this particular land and a casino may be better suited in Lake County where the connection is much stronger.

Before any decision is made to go forward, I emplor you to consider the impact on residents in terms of noise levels, public safety issues, and now, more than ever, emergency response times.

**Respectfully,
Elizabeth Pulcheon**

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From: [Gary Velasquez](#)
To: [TribalAffairs](#)
Subject: Vote no Shiloh Road Casino
Date: Wednesday, June 15, 2022 12:41:30 PM

EXTERNAL

Good day, I would like to express our no support for approving a proposed casino located off Shiloh Road, Windsor.

Listed below are some of the adverse outcomes that would result from approving this casino:

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- NOISE 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT
- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;
- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS
- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF
- GROUND WATER AND WELLS
- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE
- LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

Thank you

Gary Velasquez
Cogitativo
1608 4th Street Suite 400

Berkeley, CA 94710
+1 510 761 7420 (o)
+1 415 305 9442 (m)

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From: [Bettina Kirby](#)
To: [TribalAffairs](#)
Subject: Windsor Casino Proposal
Date: Wednesday, June 15, 2022 10:25:18 AM

EXTERNAL

Sonoma County Needs Affordable Housing NOT another Casino!!!

The Crime and Prostitution in Rohnert Park has Skyrocketed since the Casino arrived. Not just in Rohnert Park but in neighboring cities such as Petaluma and Santa Rosa. Crime and violence that we never had in Our county before the Opening of the Graton Casino locally.

We already have:

River Rock Casino in Geyserville.

Coyote Valley Casino in Redwood Valley.

Twin Pines Casino in Middletown.

Cache Creek Casino Resort in Brooks.

Robinsons Rancheria Casino in Upper Lake.

Red Fox Casino in Laytonville.

There is No Shortage of Places for Tourists and Locals to Gamble.

We Do Not Need Another Casino in Sonoma County!!

Also, we are currently in a Drought and required to conserve Water.

Why would anyone allow a Casino to come in and Use up all the water residents and local businesses are conserving? Money can't replace Our Water, Our Resources, or Our Environment. This is NOT What Windsor or Sonoma County Need Right now!

STOP THE GREED!!!! WATER IS LIFE!

“Only when the last tree has been cut down, the last fish been caught, and the last stream poisoned, will we realize we cannot eat money.”

— Cree Indian Prophecy

Bettina Kirby

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From: [Janet and Dana Brown](#)
To: [TribalAffairs](#)
Subject: Windsor Casino
Date: Wednesday, June 15, 2022 8:30:57 AM

EXTERNAL

To whom it may concern,

We are opposed to building a new casino in Windsor California and below are several reasons why.

- **Proximity to Residential Neighborhood, Churches, Schools**
- **Infrastructure Roads**
- **Loss of Open Space/Greenbelt**
- **Negative Ecological Impact**
- **Noise**
- **Drought/Water Availability/Mandatory Water Rationing**
- **Impact of Ignoring Zoning Restrictions**
- **Public Safety**
- **Quality of Neighborhood Activities**
- **No Significant Connection to the land by the Koi Tribe**
- **Emergency Response Time**
- **Greenhouse Gases**
- **Decline in Property Values**

Sincerely,
Janet and Dana Brown

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From: [Thomas Creed](#)
To: [TribalAffairs](#)
Subject: Windsor Casino
Date: Wednesday, June 15, 2022 8:17:08 PM

EXTERNAL

Enough with the casino's. NO WINDSOR CASINO. We will fight like hell to stop this abomination...

Tom Hutchison

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From: [Lynda Williams](#)
To: [TribalAffairs](#)
Subject: Wrong Location for Casino Resort
Date: Wednesday, June 15, 2022 11:47:48 AM

EXTERNAL

To Whom it May Concern:

I am writing to voice my opposition to the location of the proposed Shiloh Casino Resort by the Koi. This is absolutely the wrong location for any business that will draw large volumes of people, cars, trucks, buses and traffic 24 hours a day, 7 days a week. This area is a residential neighborhood with a long history of sudden and catastrophic wildfires and sudden evacuations that form gridlock. This neighborhood had to evacuate for both the Tubbs and the Kincade Fires. These items cannot be mitigated by throwing money at widening the road as all roads for evacuation lead to Highway 101. This highway has been too small to support the population for 60 years. For the past 40 years widening has been in process. Now that it is 3 lanes wide, it is still too small for the daily load and becomes impassable in the case of an evacuation. Any additional improvements will take decades to deliver. In the meantime, there is no safe evacuation route for the citizens who live here now.

Fire season never ends in this area and the next fire will happen. Will the residents be able to evacuate safely with the addition of the population of Windsor added daily to this site? What about the customers at the casino? What will happen to them if they cannot safely evacuate? This eventuality has been discussed over and over again and should be of concern to the BIA. Graton Rancheria has 10 million visitors a year. That is over 27,000 per day. The population of Windsor is 27,000. This proposed casino resort has almost twice the square footage of Graton Rancheria. Does that mean more than 27,000 visitors per day, adding more noise, traffic and pollution to a quiet residential family neighborhood? This would double the population that has to be evacuated.

Nowhere else in California has a casino resort of this scale been allowed to be built in the middle of residential neighborhoods. If this happens here it will set the precedent for all other casino projects in California. Is this the California that any of us wants? Where does it end? Are families supposed to live with the constant noise, traffic and crime that a casino brings? Why are our families and children once again being considered last? Esposti Park is also directly across the street from this proposed site. It is home to two Little League fields used by the children of this community. Families have birthday parties here and residents play and walk their dogs here daily. What happens when the park fills with drug users, prostitutes plying their trade, discarded needles and all the other crime that comes with a business that promotes vice? It will no longer be safe or a usable community resource. Residents will be barricaded in their homes.

We are in the worst drought in 1200 years and it gets worse by the day. We already do not have enough water to support the housing that is currently under construction in this county to provide shelter to everyone who needs it. A casino resort will not have to play by water conservation rules that everyone else in this county has to follow. Further depletion of the water table will result. We will run out of water, yet tourists will come to the casino to flush unlimited toilets, take unlimited showers, while the Koi tribe empties the water table to make money for their small outside group. This project will not provide any benefit to the

community.

Local businesses currently cannot find staff for all the job openings. Hours are limited by the lack of employees. If this project goes through, they will have to compete with a huge employer who does not have to follow the same rules as they do. Many local businesses will not survive.

The local tribes of Sonoma County will be greatly impacted by this project. The Koi do not come from Sonoma County. They are forcing their way into this area and taking business away from the local tribes using a tribe from Oklahoma as financial backers. This Oklahoma tribe is using the Koi to get a foot into the California casino market. They are using the entire community in Sonoma County and do not care about any of us at all. Our lives will be ruined by this casino. Our property values will be gone. This county will not be recognizable if this project goes through. Many folks will move away. What kind of a community will be left in its place?

Yes, I live directly across the street, less than 50 feet from this proposed site in the Oak Park neighborhood. It is unthinkable that all of our quiet family lives, the entire investment of a lifetime can be stripped away by this project overnight. And for what? Another casino? Why are we not discussing the impact of a business that brings vice into our communities? Are we so woke that we cannot talk about the fact that the emperor has no clothes? All data shows that crime rises around casinos. Drug use, prostitution, break ins, and drunk driving deaths, all rise. Please do not make deals with this tribe for money. Represent your constituents. Defend our lives, our futures. Discuss all impacts this project will have on the environment and the quality of life here in Sonoma County. We must do all we can to save the future of the Sonoma County we know and love. This project needs to find a different location.

Thank you for taking whatever action you can against the location of this project.

Best Regards,

Lynda Williams
5801 Mathilde Drive
Windsor, CA 95492

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From: [Larry Lapidés](#)
To: [TribalAffairs](#)
Subject: casino objections
Date: Thursday, June 16, 2022 5:22:05 PM

EXTERNAL

I would like to register my objections to the proposed Koi tribal casino on Shiloh Road. This has a lot of potential problems, including use of scarce water resources, noise in the neighborhood, and inability to exit the area in case of wildfires. This project should be cancelled.

Larry Lapidés
larry@lillapides.com
(925) 519-1234
6108 Lockwood Dr.
Windsor, CA. 95492

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From: [Mark Catelani](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Thursday, June 16, 2022 3:11:41 PM

EXTERNAL

I strongly oppose the location proposed by the Koi tribe for a casino in Sonoma County. There are a number of reasons I oppose this location off E. Shiloh Road with the key reasons as follows:

- Wildfire Risk
- Proximity to Residential Neighborhood, Churches, Schools, Community and County Parks
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Public Safety
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases
- Decline in Property Values

When I look at all of the above reasons combined, I have great concerns on the impact that this proposed casino will have on our community. As an example, looking at wildfire risk in this area along with infrastructure roads, public safety, and emergency response time, my concern grows exponentially.

All of the above concerns should be thoroughly investigated as part of the environmental assessment and impact review.

Thank you for considering my comments.

Best regards,
Mark Catelani

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From: [Richard D. Schram](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Thursday, June 16, 2022 5:41:31 AM

EXTERNAL

I vehemently oppose the planned casino on Shiloh Road.
Richard Schram , 7335 Shiloh Ridge, Santa Rosa ,CA

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From: [Brenda Catelani](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Thursday, June 16, 2022 2:32:42 PM

EXTERNAL

I strongly oppose the location proposed by the Koi tribe for a casino in Sonoma County. There are a number of reasons I oppose this location off E. Shiloh Road with the key reasons as follows:

- Wildfire Risk
- Proximity to Residential Neighborhood, Churches, Schools, and Parks
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Public Safety
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases
- Decline in Property Values

When I look at some of these points combined, my concern grows. As an example, looking at wildfire risk in this area along with infrastructure roads, public safety, and emergency response time, my concern grows exponentially.

All of these concerns should be thoroughly investigated as part of the environmental assessment and impact review.

Thank you for considering my comments.

Brenda Catelani

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From: [Lynn Darst](#)
To: [TribalAffairs](#)
Subject: Casino Opposition
Date: Thursday, June 16, 2022 3:48:03 PM

EXTERNAL

My name is Ron Darst, age 85 and I am a Windsor resident for 23 years. I need to walk with a cane. I have been enjoying a restful, peaceful retirement. To have a casino on East Shiloh is ridiculous and offensive. A planned 200 room hotel, six restaurants, and a casino for this parcel of land is the WRONG LOCATION, particularly due to our crisis in water—drought circumstances. My lawn is turning brown, I don't flush the toilet often and I take fewer showers in order to save water. Our water reservoirs are barely able to serve the population. The restaurants and the hotel use a great deal of water.

It is poor judgement to force our neighborhood with 20,000 visitors at the casino on a daily basis, along with the added noises, traffic, crime and drunk driving that may occur.

Thank you for your support in opposing an unnecessary casino in my neighborhood.

Sincerely,

Ron Darst

Sent from my I-Pad

Sent from my I-Pad

Sent from my I-Pad

Sent from my I-Pad

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From: [Darin Scott](#)
To: [TribalAffairs](#)
Cc: [Darin Scott](#)
Subject: Casino Opposition
Date: Thursday, June 16, 2022 5:01:23 PM

EXTERNAL

Hello,

I am a resident of Windsor and I'm in strong opposition to the proposed casino site. Here are just a few issues:

- Proximity to Residential Neighborhood, Churches, Schools
- Public Safety
- Decline in Property Values
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Infrastructure Roads
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases
- Loss of Open Space/Greenbelt
- Etc...

I used to live in Rohnert Park since 1990. I moved to Windsor to get away from the casino that opened up there. The same issues Rohnert Park is having will occur here. It's not the right location!!!

Regard
Darin Scott
10936 Rio Ruso Dr
Windsor Ca

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From: [Karen Burkett](#)
To: [TribalAffairs](#)
Subject: casino proposed for Windsor
Date: Thursday, June 16, 2022 3:34:18 PM

EXTERNAL

We are very opposed to a casino resort being built by Shiloh Park in Windsor. The roads in Windsor are already over crowded and falling apart. When we had to evacuate for the Kincade fire, it was a very congested difficult and dangerous situation. There are already hundreds of new homes being built in :Windsor without increasing the road access and improvements. There are many other concerns as well

Wildfire Risk · Proximity to Residential Neighborhood, Churches, Schools · Infrastructure Roads · Loss of Open Space/Greenbelt · Negative Ecological Impact · Noise · Drought/Water Availability/Mandatory Water Rationing · Impact of Ignoring Zoning Restrictions · Public Safety · Quality of Neighborhood Activities · No Significant Connection to the land by the Koi Tribe · Emergency Response Time · Greenhouse Gases · Decline in Property Values

Please do not allow this project to go forward.

Sincerely,

Scott and Karen Burkett

707-838-0518

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From: [Lori Lapidés](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Thursday, June 16, 2022 5:44:51 PM

EXTERNAL

> I would like to register my objections to the proposed Koi tribal casino on Shiloh Road. This has a lot of potential problems, including use of scarce water resources, noise in the neighborhood, and inability to exit the area in case of wildfires. This project should be cancelled.

Lori Lapidés, neighbor

>

Sent from my iPhone

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From: [Renee Avanche](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Thursday, June 16, 2022 6:41:34 PM

EXTERNAL

Our family lives on Old Redwood Hwy, next to Mark West Elementary School and I'm concerned about the heavy traffic that will come along with this casino. As a Mother, I'm worried about the safety of the neighborhood kids that ride their bikes or walk to school. With an increase in traffic, is an increase in accidents. And my Mother, who provides childcare for my two children (ages 12 & 7) still lives in my childhood home at 127 E SHILOH RD. It's a quiet, private road with no through traffic- an ideal place for kids to play outside with their dogs and ride their scooters or bikes safely. Building a casino across the street from this private road will put an end to that. I'm concerned that the casino will bring crime such as DUI, theft, etc. into this safe and family friendly neighborhood. Please consider the negative impact this casino will have on all the families that love living in this area.

- Renee Avanche

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From: [Allison Baker](#)
To: [TribalAffairs](#)
Subject: casinos in residential neighborhoods, Shiloh Rd at Old Redwood Hwy
Date: Thursday, June 16, 2022 9:30:52 PM

EXTERNAL

Hello,

Here are my concerns about the proposed building of the casino at the end of my street:

the proximity to residential neighborhoods, churches, and schools,

the infrastructure of the roads leading to and from the area,

the loss of open space/greenbelt,

the negative ecological impact,

the noise.

the current drought/water availability/mandatory water rationing,

wildfire risks,

the impact of ignoring zoning restrictions,

public safety,

the quality of neighborhood activities,

the insignificant connection to the land by the Koi Tribe,

emergency response time,

and the decline in property values.

Sincerely,

Allison Baker

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From: [Barbara Reed](#)
To: amy.dutschke@bia.gov
Cc: chad.broussard@bia.gov; [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Thursday, June 16, 2022 3:18:51 PM
Attachments: [Jun 16, Doc 1.pdf](#)

EXTERNAL

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Sent from my iPhone

Sent from my iPhone

Sent from my iPhone

From: [Kari Kincheloe](#)
To: chad.broussard@bia.gov
Cc: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Thursday, June 16, 2022 8:09:32 AM

EXTERNAL

Dear Mr. Broussard:

We are writing to strongly protest the application by the Koi Nation tribe's proposed Shiloh Resort and Casino Project. The proposed site is highly inappropriate for the proposed use for the following reasons:

1. We are in a time of severe drought. Allowing construction of this project will significantly lower the water table in the surrounding area. The Town of Windsor is currently in a water rationing protocol and this project would exacerbate the already dire water situation.
2. The surrounding road infrastructure is insufficient to support the level of traffic generated by this project. Shiloh Road and Old Redwood Highway (the roads serving the project) are only one lane each direction. In times of emergency evacuations these past five years, traffic flow is stopped for hours trying to get existing residents out of the area. It would endanger lives to increase the road traffic by the magnitude proposed by this project.
3. The property proposed for this project is currently zoned for agricultural and residential use. Not commercial use. It is adjacent to residential communities. This is not an appropriate location for a project of this type.
4. The proposed project is adjacent to a park. The park is used year round for youth baseball/softball, football and soccer leagues. Again, not an appropriate location for a casino.
5. The proposed site is home to an extensive wildlife population that will be forever displaced because of this project.
6. This project will add significant noise and light pollution to a very quiet residential/agricultural area.
7. The Koi Nation tribe as well as the tribe contracted to manage the casino has no cultural/historical connection to this area.

We have lived in Windsor for 37 years. This project will negatively impact our community in numerous ways. Please listen to our concerns and deny the application for this project. We are placing our hopes in you to preserve our small town community.

Thank you for your consideration in this matter.

Kari Kincheloe, Real Estate Broker
John Kincheloe, R.C.E.
210 Moll Drive
Windsor, CA 95492

(707)484-2274

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From: [ashleyyyyyy.C](#)
To: [TribalAffairs](#)
Subject: No casino
Date: Thursday, June 16, 2022 6:27:12 PM

EXTERNAL

I strongly disagree that this county needs a casino. Windsor is already so over populated and crowed we do not need more traffic.

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From: [Mary Hou](#)
To: [TribalAffairs](#)
Subject: No casino in residential neighborhood!
Date: Thursday, June 16, 2022 11:16:44 PM

EXTERNAL

My husband and I strongly oppose the building of a casino at Shiloh Rd and Old Redwood Highway. This type of business does NOT belong in our neighborhood!

The green belt of the vineyard would be destroyed. The increase in traffic is detrimental. The increase in crime and foot traffic is not wanted.

We have both seen the devastation that's happening to Rohnert Park with the building of Graton Resort. We moved from south Santa Rosa exactly for that reason! We do not want to see another casino in our neighborhood! It is not needed! There is no need for it!

The Koi Nation has no significant connection to the land. Don't build here!

What about the drought? We are requested to only use water on specific days and to let our gardens dry up but this proposed casino can come in and use our precious water! NO TO THAT!

Don't need another hotel and more restaurants. No casino!

DO NOT LET THIS CASINO BE BUILT!

Susan and Peov Hou

Sent from my iPad

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From: [Nick Ratiani](#)
To: [TribalAffairs](#)
Subject: No Shiloh casino
Date: Thursday, June 16, 2022 5:58:23 PM

EXTERNAL

I am strongly opposed to building a casino on the corner of Shiloh Road and Old Redwood Highway. While my reasons for opposition are many, I have two primary concerns:

1. The E. Shiloh Road entrance and exit from the casino would create a back-road exit up E. Shiloh Road to Faught Road. Faught is a small, narrow, windy road that proceeds past an elementary school at either end. Drunk patrons will use the back roads in an effort to avoid being arrested, and will likely turn right onto Faught. Then they will follow the road and make a hard right turn onto a portion of the narrower road with deep ditches on both sides and a hard left turn. Then they will be driving through the Wikikup neighborhood where I live. **San Miguel Elementary School** will be on their left. This kind of traffic will be unsafe and bring the wrong element into our neighborhood.
2. I am a member of **Shiloh Neighborhood Church**, which is directly across Old Redwood Highway from the site of the proposed casino. According to the architect's renderings, the casino's main driveway will be directly across from our church's driveway. The security and safety issues for our church are very concerning. Patrons who leave the casino, or who are forced to leave by casino security would find an empty church parking lot an easy place to gather. We already deal with occasional abandoned cars, litter, and car drivers meeting each other at night. This would increase dramatically, and we cannot afford to hire security guards. We could not ask our pastor and family to live in the parsonage on the property any longer. A casino across the street would likely mean the end of our church as we know it in that location.

I am strongly opposed to building a casino across from the church I love and near the neighborhood in which I live. Please do what you can to prevent what would be a hugely negative change to our neighborhood.

Sincerely,
Nick Ratiani

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From: [Sandra Arriola](#)
To: [TribalAffairs](#)
Subject: OPPOSING WINDSOR CASINO
Date: Thursday, June 16, 2022 12:17:40 PM

EXTERNAL

To whom it concerns:

I strongly oppose the proposed casino in Windsor. I moved to Windsor in 1995 from Santa Rosa. I love Windsor and so glad that I moved here and raised my three children. What I found that Santa Rosa didn't have was a strong close community. My kid's friend's parents were my friends. I belonged to a large church that was awesome and gave back to the community. Windsor is clean, safe, and family oriented. When I am in Windsor, I feel like I am far from Santa Rosa. That is about to end if the casino is allowed to be built. The casino will bring crime, drugs, drunks, prostitution, traffic, and the homeless. Windsor is already seeing more homeless move in. The couple of positives (if you find them positive) such as jobs and revenues do not outweigh the negatives. Windsor is not the place for this type of business. I see our home prices drop, and our safety and lifestyle be diminished by a casino.

Do not turn our nice town of Windsor into a crime infested hellhole.

Thank you,

Sandra Oakes-Arriola

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From: [Judy Witwicki](#)
To: [TribalAffairs](#)
Subject: Proposed Casino in Residential Area
Date: Thursday, June 16, 2022 5:51:25 PM

EXTERNAL

Hello I am a 40 year resident of Sonoma County. I highly oppose this plan for many reasons most if not all that I am sure you have already heard about.

A casino should just not be in this location. Drive around it, look around it. There are so many more appropriate places in our area for a casino. This is a neighborhood with homes, churches and schools nearby. A casino just does not fit. It is just not the right thing to do.

I am not going to copy and paste the dozens of specific reasons because I know you know them all already. My only plea is to hear and understand that this location simply is not the right one for a casino.

Thanks for listening.

Regards,

Judy Witwicki

Sent from my iPhone

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From: [Daniel Heidenreich](#)
To: [TribalAffairs](#)
Subject: proposed Koi Casino
Date: Thursday, June 16, 2022 10:12:53 AM

EXTERNAL

Dear Tribal Affairs Division,

I am writing you as a concerned citizen and resident of Sonoma County, California about the intention of the Koi Nation to petition for land sovereignty and construction of a casino & resort on the parcel at 222 Shiloh Road. I ask for you to contemplate the following factors in your decision of whether to support or oppose this request.

The intention of the Indian Reorganization Act and Fee-to-Trust process was enacted with good intentions to restore the ancestral lands of tribes that had been displaced throughout the past centuries. This program was used in good faith by the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians, to establish sovereign territory in Sonoma County, based off legitimate claims of ancestral presence in the area. The Koi Nation originated in Clearlake, Lake County, and therefore objectively fails the initial test of a historical connection to the 64-acre parcel in question on 222 Shiloh Road. To overlook this critical point is to categorically ignore the precedent set by all the Indian nations who have arduously and patiently petitioned the Department of the Interior and Bureau of Indian Affairs in good faith. The Koi have demonstrated twice before their disregard for the rules and process by unsuccessfully attempting to ram land trust and casino development projects into other Bay area communities of Oakland and Vallejo. This precedent is critical to understand that the same reason behind the dismissal of their applications then is valid now for this misguided third attempt for a development off Shiloh Road. While it is sad to see the Koi people being so poorly counseled, and seemingly taken advantage of by predatory 'advisors', that does not absolve them of the same duty to prove historical ties to the actual piece of land in question.

Beyond the objectively and categorically clear facts of no historical ties, I also want to highlight several additional realities locally which make this proposed development even further misguided. It is imperative the Tribal Affairs of Sonoma County appreciate the poor logistics and already fragile situation in the proposed development area. Sonoma County is already in a severe drought with most of the municipalities already implementing water rationing and conservation programs. The construction of what has been proposed as the largest casino in Northern California will have a profoundly negative impact by exponentially depleting the already vanishing water table from an area which is already in a severe drought and further stress the surrounding area, making it more vulnerable to wildfire. Conversely, vineyards have proven to be one of the best firebreak defenses in Sonoma County and this fact is confirmed and supported by University of California-Davis, the leading academic authority in viticulture, and County firefighting experts. The vast majority of the 64-acre parcel is currently under vine and serving as a firebreak to the surrounding residential neighborhoods, so the proposed development would be a giant step backwards by removal of the vineyard fire protection and replacement with a giant flammable structure. Lands within one mile and adjacent to 222 Shiloh Road were consumed in wildfires in 2017 (Tubbs), 2019 (Kincade) and even last year, 2020 (Glass), albeit slightly further away. The Tubbs and Kincade fires prompted midnight, emergency evacuations of residents in the surrounding community. There are clear images of gridlock traffic for hours on US 101 during these evacuations, so imagine the chaos and threat to life from thousands of casino guests and staff compounding to the evacuation and clearly threatening the ability of local residents to make their egress. A potential additional complication would arise from the proposed development of an assisted living, elderly care residential facility, just west of the proposed site, at the south-east intersection of the Shiloh road and US 101 interchange. Given these factors it is not difficult to see how impossible it would be to even reach the US 101 onramps with this additional traffic on two-lane, Old Redwood and Shiloh Roads.

There is a recent experience that public safety in these moments is dependent on clear, unobstructed and

low-density roads to allow residents to flee and first responders to access the affected areas. To grant the Koi a sovereign territory in the middle of this high-risk area, where no zoning laws or other standard public safety protocols are applicable, is to subordinate all reasonable safety expectations of the other residents to the financial interests of casino investors. This would be an unconscionable betrayal of public trust in government institutions when that trust is arguably already at an all-time low. The residents and taxpayers of Sonoma County deserve full transparency and input towards any decision that affects public safety in an area which has consistently become an almost annual wildfire flashpoint and evacuation zone.

We humbly request your consideration of these critical public safety factors in deliberating the Koi request for a land trust at 222 Shiloh Road. It is not an exaggeration to state that lives may be saved or lost depending on the outcome of your determination.

Sincerely,
Daniel Heidenreich
Resident, Parent and Community Member of Santa Rosa, Sonoma County

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From: [Pat Berry](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT.
Date: Thursday, June 16, 2022 2:47:01 PM

EXTERNAL

To Whom it may concern:

There are many reasons a casino at this location is not appropriate. It is surrounded by single family home residential neighborhoods. Esposti park, home to kids football, baseball, and family picnics is right across the street. Shiloh Regional park, frequented by hikers, bikers, walkers, and horseback riders as well as family gatherings, is at the backside. There are 3 elementary schools within less than 3 miles. The traffic that this casino would bring to Old Redwood Hwy, Fulton Rd, Airport Rd, Faught Rd, Pleasant Ave, Shiloh Rd, River Rd and Mark West Springs would be a disaster, causing major gridlock and congestion especially during the morning and evening commute/school drop off or heaven forbid another fire emergency and evacuation! All arteries were slow to no movement with fire closing in. The added traffic during another of those events could be a matter of life and death.

NOISE level and LIGHTS, with business operations 24/7 in a location surrounded by residential neighborhoods will definitely have a major adverse affect on their quality of life.

The loss of open space and safe comfortable use of both Esposti and Shiloh Regional parks.

TRAFFIC

WILDFIRE RISK TO PUBLIC SAFETY BY INCREASED TRAFFIC GRIDLOCK DURING EVACUATION

HARM TO EPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/GREENBELT

ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS

BUSINESS OPERATION OCCURS 24/7 IN AREA SURROUNDED BY RESIDENTIAL NEIGHBORHOOD

PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/DEATH 24/7

HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF

GROUND WATER AND WELLS

LOSS OF RIPARIAN CORRIDOR, WATER FLOW AND HABITAT FOR WILDLIFE

LOSS OF PROPERTY VALUES FOR ALL THE REASONS ABOVE.

Please find a more appropriate piece of land for this Casino Resort.

Pat and Gayle Berry

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do not click any web links, attachments, and **never** give out your user ID or password.

From: [Lance Cottrell](#)
To: [TribalAffairs](#)
Subject: REJECT SHILOH CASINO RESORT.
Date: Thursday, June 16, 2022 3:35:23 PM

EXTERNAL

I write to express my strong opposition to the Koi casino project just outside Windsor on Shiloh Rd.

My greatest concern is with fire safety and evacuations. Having evacuated a number of times over the last few years, with fires immediately encroaching on my property at 853 Shiloh Glen, I am intimately familiar with the dangers caused by heavy traffic on small roads during such emergencies. Traffic backups are common at such times. The addition of hundreds or thousands of additional vehicles could easily lead to loss of life.

I am also very worried about the risks to children and other users of Esposti Park and Shiloh Regional Park which are both immediately adjacent to the proposed casino location. Increased traffic combined with alcohol consumption and likely loitering in the parks will endanger local youth and other users of the facilities.

Finally, I am concerned about traffic accidents, particularly car vs. pedestrian accidents caused by the additional traffic and due to the heavy alcohol consumption at casinos and the heavy use of the road by cyclists and walkers.

There are no other major casinos located or proposed to be located in residential neighborhoods like this. It is a completely inappropriate choice. There are numerous available lots in commercial areas with the facilities needed to support such a massive project and its associated impacts.

--

Lance Cottrell - lance@lancecottrell.com

<https://FeelTheBoot.com>

Listen to the Feel the Boot podcast at <https://FTB.bz/podcast>

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From: [Barb Cottrell](#)
To: [TribalAffairs](#)
Subject: Reject Shiloh Casino Resort
Date: Thursday, June 16, 2022 2:46:17 PM

EXTERNAL

I am writing to express my opposition to the proposed Shiloh Casino. The location is on the only street in and out of neighborhoods at risk from wildfires. The traffic the casino would add to these narrow streets could pose a hazard in an emergency situation. Also, a new casino would put an additional burden on existing infrastructure, particularly water resources. With some communities limiting new development because of the drought, the decision to move forward with such a resource intensive project seems ill-timed at best.

Thank you for allowing me the opportunity to express my views.

Barbara Cottrell

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From: [Amy Ramsey](#)
To: [TribalAffairs](#)
Subject: Reject the Shiloh Casino
Date: Thursday, June 16, 2022 8:38:55 AM

EXTERNAL

To whom it may concern,

I'm writing today to share my strong opposition to the proposed casino on Shiloh Road in Santa Rosa. I am a local resident and live nearby the planned site for this casino. I have many concerns about the casino and believe that it will have a devastating impact on our neighborhood and potentially fatal consequences if/when we experience another wildfire in the area.

I hope you'll take time to carefully consider each of our concerns below and reject the Shiloh casino proposal. Lives are at stake and the future of our community depends on this decision.

- TRAFFIC - THE STREETS WERE NOT DESIGNED TO HANDLE THE AMOUNT OF TRAFFIC THAT WILL COME WITH THE CASINO. THERE WILL BE A CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7

- NOISE 24/7 IN OUR OTHERWISE QUIET NEIGHBORHOOD

- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION. THIS IS A HUGE ISSUE GIVEN THE GEOGRAPHY AND SINGLE LANE ROADWAYS TO EXIT THE NEIGHBORHOOD

- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT

- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;

- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS

- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7

- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF GROUND WATER AND WELLS

- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE

- LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

Sincerely,
Amy Ramsey
840 Shiloh Oaks, Santa Rosa, CA 95403

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From: [Evelyn Franco](#)
To: [TribalAffairs](#)
Subject: Shiloh casino
Date: Thursday, June 16, 2022 8:11:19 AM

EXTERNAL

As a Sonoma County resident, I vehemently oppose a Casino Resort on East Shiloh Road. This is an inappropriate location for a 24 hour business that includes a 200 room hotel, six restaurants, conference center, spa and a casino. The 68 acre parcel is surrounded by a number of quiet neighborhoods, churches, schools, parks and a community which enjoys outdoor activities.

I strongly urge that the Sonoma County Board of Supervisors support our concerns:

... FIRE SAFETY & HUMAN LIFE: We have a history of deadly fires. The evacuation of an additional 20,000 plus, casino customers is a recipe for disaster. There is no safe way of evacuating this amount of people from this particular area, without increasing the risk of death.

... WATER SHORTAGE/DROUGHT: Sonoma County residents are being asked to conserve water. Many of us are taking fewer showers, not watering our lawns or flushing our toilets often. Lack of water for a business that invites over 20,000 people a day puts too great a water burden on the people in the area.

There are many concerns that go well beyond the above that include increased crime, drunk driving, increase of noise, lighting and traffic, devaluation of our property. The loss of the fire break of the vineyards would be detrimental as they saved homes during the last fires.

This is the WRONG LOCATION for a business operation of this size.

Sincerely,
Evelyn Franco

Evelyn Franco
707.772.7308

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From: [Camilla Heidenreich](#)
To: [TribalAffairs](#)
Subject: Shiloh Rd Koi Casino
Date: Thursday, June 16, 2022 8:49:09 AM

EXTERNAL

To whom it may concern,

We are residents of Shiloh Road and we strongly oppose the building of this casino. Our gravest concerns are the wildfire risk and road infrastructure. This area cannot sustain such a development and poses serious public safety risks (for the surrounding communities and potential employees of the casino). The roads will not be able to accommodate evacuations in the event of a wildfire and also the emergency rescue crews to get through (slowing the response time tremendously).

Please consider these serious issues and how they will impact the community. Thank you kindly.

Sincerely,
Camilla and Daniel Heidenreich

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From: [Stephanie Camara](#)
To: [TribalAffairs](#)
Subject: Strong Opposition to proposed casino site
Date: Thursday, June 16, 2022 3:13:36 PM

EXTERNAL

Hello,

We purchased our home in August 2019 in this wonderful neighborhood in Larkfield and in no way shape or form would we ever want a casino anywhere near our neighborhood. Our family, along with our entire neighborhood, **STRONGLY OPPOSE** this project. **WE DO NOT WANT A CASINO IN OUR NEIGHBORHOOD.** This is an inappropriate location for something this size.

These are some major concerns:

- We are already rationing our water and have been for a couple years. We do not have the water capacity to support any part of this project.
- The wildfire risk and public safety in general
- Proximity to our residential neighborhood
- Noise concerns, quality of our neighborhood activities
- Decline in our property values
- Negative ecological impact
- greenhouse gases

Please. Please do not allow this project to move forward. We all beg you.

Concerned citizen,
Stephanie Camara
Larkfield Neighbor

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June 17, 2022

Representatives for Sonoma County,

I am writing today to express concern, as a 38-year resident of Sonoma County, a registered professional engineer, a licensed land surveyor and college engineering/land planning professor, about the casino proposed along east Shiloh Rd in the unincorporated area of Sonoma County. I am not opposed to the concept of a casino, but am bewildered how any responsible entity could consider urban development at this location, let alone a casino of this magnitude. This is a selfish and blatant disregard to the environment, neighborhood and our community.

The County of Sonoma and Town of Windsor, which this proposed monstrosity of a development borders, have active policies in place that prohibit development of this nature. The land use designation in the Sonoma County General Plan "Land Intensive Agriculture" was created to enhance and protect lands best suited for permanent agricultural use. These policies are established to promote responsible growth and prevent urban sprawl in accordance with the Local Agency Formation Commission's (LAFCO) policies.

It would be an irresponsible violation of these policies and completely inappropriate to build a casino in a residential area with our families and schools, inviting crime, drugs and prostitution, particularly when the residents of Sonoma County relied upon these policies and the actions of our Board of Supervisors approving them when purchasing their homes and nesting in this area. A development of this nature is not allowed under the California Environmental Quality Act (CEQA) and would not be permitted if proposed by any other entity, so I'm astonished that this is even being considered. In summary:

- The casino would bring crime, drugs and prostitution, threatening the safety of our community and degrading property values.
- The casino would introduce unwelcome noise, odors and light pollution which violate the County's policies.
- Shiloh Road is currently operating at a Level of Service of "D". The Press Democrat noted that the casino would bring 1,100 employees and draw 20,000 people a day, degrading the Level of Service to an unacceptable level.
- California now evaluates the environmental impact of a development based on the number of vehicle miles traveled when accessing a facility (VMT). Adding 1 vehicle a day for an unplanned land use would violate this policy. The casino will bring 20,000 people a day, substantially increasing VMT and greenhouse gas emissions.

- Shiloh Road is planned as a 2-lane road with a single travel lane in each direction in the Town of Windsor's governing documents. Development is progressing along this corridor based on traffic counts supporting this configuration. Most roads in Sonoma County are built by the developments fronting them. It would be an unfair burden for the Town to require all property owners along Shiloh Road to give up right of way, and build a wider road as a condition of development, purely to benefit the casino.
- Sonoma Water and the Town of Windsor provide sewer service to the unincorporated area of Sonoma County and the residents of the Town. Their facilities do not extend, nor were they ever planned to accommodate the waste discharge from the casino. Therefore, the casino would have to build their own sewage treatment plant in the back yards of our residents, bringing unsightly facilities and unwanted odors.
- The Town of Windsor and California American Water provide potable water service to this area for drinking, irrigation and fire protection. Their facilities do not extend to, nor were they ever planned to serve this site. Therefore, the casino would have to drill their own well(s) and further diminish groundwater supply in this area. California American Water uses wells in this area to serve the existing residents and would be forced to compete for this water, drilling deeper wells and passing these costs along to existing residents.
- The casino is proposed immediately adjacent to a Wildland Urban Interface Area (WUI). We have observed two devastating fires in this immediate area in the last 5 years. Residents attempting to flee their homes during the Tubbs fire, which took more than 5,600 structures in a matter of hours, were grid-locked in traffic trying to lead their families to safety, down the only viable evacuation route for many local residents. The Casino will eliminate an existing agricultural greenbelt and provide additional strain on our roads and ability to seek refuge during emergency events.
- Although Sonoma County residents are in dire need of housing, Permit Sonoma won't allow a residential lot to be split to build another home within a WUI area as a life/safety precaution, but these folks want to build a casino?
- The local water supply network is designed to provide approximately 1,500gpm for firefighting. California American Water's tanks ran dry when fighting the Tubbs fire. A development of this magnitude having wood framed construction would require

a flow rate of 8,000gpm (4,000gpm for sprinklered buildings). The local water purveyors don't have the capacity for this or the infrastructure to support this flow rate. Therefore, the casino will need to build their own tank or tanks which may require more than 500,000 gallons of water if computed using NFPA1142. However, this code wasn't intended to be used for sizing firefighting facilities in an urban design setting. When considering the California Fire Code, the water tank storage requirement could approach 1 Million gallons, even for sprinklered buildings.

- Pruitt Creek traverses the proposed casino property. Even if the property could be developed, our local land development policies require that the creek be preserved and enhanced with landscape and development be setback from the creek.
- Sonoma Water, our local flood control agency and the Town of Windsor, in their Stormdrain Master Plan, identify Pruitt Creek as being incapable of handling the design storm event. The existing mobile home park and other downstream residents already experience flooding during inclement weather. The northbound Shiloh Road off ramp at Hwy 101 also floods and experiences closures on a regular basis. Substantially increasing the amount of impervious surface upstream, at this site, will add runoff and create exacerbate flooding. A development this size might generate as much as 100 cubic feet of water per second which is approximately 45,000 gallons per minute. This might require a 2-acre detention basin to help offset and mitigate the additional runoff, inviting mosquitos and other vector borne diseases.
- The Russian River and its tributaries, including Pruitt creek are listed as impaired water bodies under the Clean Water Act. The State of California requires that development draining to these tributaries treat and infiltrate stormwater. A development this size could require 4-acres of bioretention, aside from the requirement to temporarily detain the peak runoff to help mitigate flooding.

As may be gleaned from the summary above, Shiloh Road is the wrong place for a casino, creating an unsafe environment for our residents on multiple levels.

Respectfully,



Geoff Coleman PE, PLS, CDT

To: The County of Sonoma,

Myself and most community members vehemently oppose this proposed casino site.

As you can see in the map below, the proposed site sits in direct contact with numerous neighborhoods (yellow shaded), two churches (blue shaded), two parks and a school (green shaded). Also notice, that their rendering photo is far from scale in relation to the proposed parcel. The proposed casino is will be built on the pink shaded area within the red outline, directly adjacent to many family homes.

The property that the Koi Nation has purchased is currently two parcels (red outline); with an estate home with vineyards on one parcel and all vineyards on the second (shaded in pink). The renditions published on the Koi Nation website are proposing a \$600 million project. It will include: a 2,500-gaming machine facility, 200 room hotel, six restaurants and food service areas, conference meeting space and spa. It will have 1,100 full-time employees, operate 24 hours a day, 7 days a week. The vehicle and charter bus traffic will be significant in volume and 24 hours a day. Also note that the rendition does not depict the acres and acres of parking which will be necessary to support such a large facility, employees and customers.

This development will flood the current community with traffic, generate tremendous amounts of light and noise and most likely result increased crime. Lights from the parking lot will bath neighboring homes with bright light, every and all night. It is a massive development that does not belong here.

The other obvious concerns include lack of water and fire evacuation congestion in case of an emergency. This area has been evacuated two separate times over the last four years. We are now into our third year of mandatory water rationing.

After some informal research I have **not** been able to find one current major casino in the state of California that has a direct, immediate impact on a surrounding residential area. According to a Google search, the proposed Koi Nation casino will rank #6 in the state for number of slot machines. While the overall gaming space has not been disclosed, comparable casinos range between 74,000-130,000 square feet in floor gaming space. The total proposed development is reported to span 1.2 million square feet. Cache Creek Casino and Resort, Brooks, CA; Viejas Casino and Resort, Alpine, CA; Redhawk Casino and Resort, Placerville, CA; all comparable casinos are located far away from any major surrounding residential areas. Please see comparable casinos and maps at the bottom of this attachment.

From what I have researched, there is no precedence, none, of a major casino in the state of California being built adjacent to a residential area as the Koi Nation are proposing. Despite the Koi's claims, this is not a rural area, this is an area full of residential neighborhoods, schools, churches and parks. This is a massive development that will literally cast shadows across residential homes. The scope and scale of this project is inappropriate for such an area.

The Koi Nation have already attempted to build casinos in Oakland, close to the Oakland International Airport and Vallejo on Mare Island. Why have they failed in their previous attempts? Both of those locations would have had almost zero impact on surrounding residential areas. The reason is that they were unable to prove those areas fell within their historical lands, the same is true of this location as well.

There has been much discussion about the veracity of the true homeland of the Koi tribe. From all accounts their true homeland is in Lake County, in the Clearlake area. They are contending the proposed location is within 10 miles tribal lands. I believe this is less than truthful, from piecing together various statements, they are claiming this part of Sonoma County was part of their migratory area so that means the site is within 10 miles of the trade routes their ancestors traveled. This seems to be a very loose and deceptive claim to this area being part of the traditional grounds. Growing up in Sonoma County I was always taught that this was the Pomo Indian tribe's ancestral grounds. So, I ask the question, why are the Koi Nation being allowed to build a casino so far from their traditional homelands?

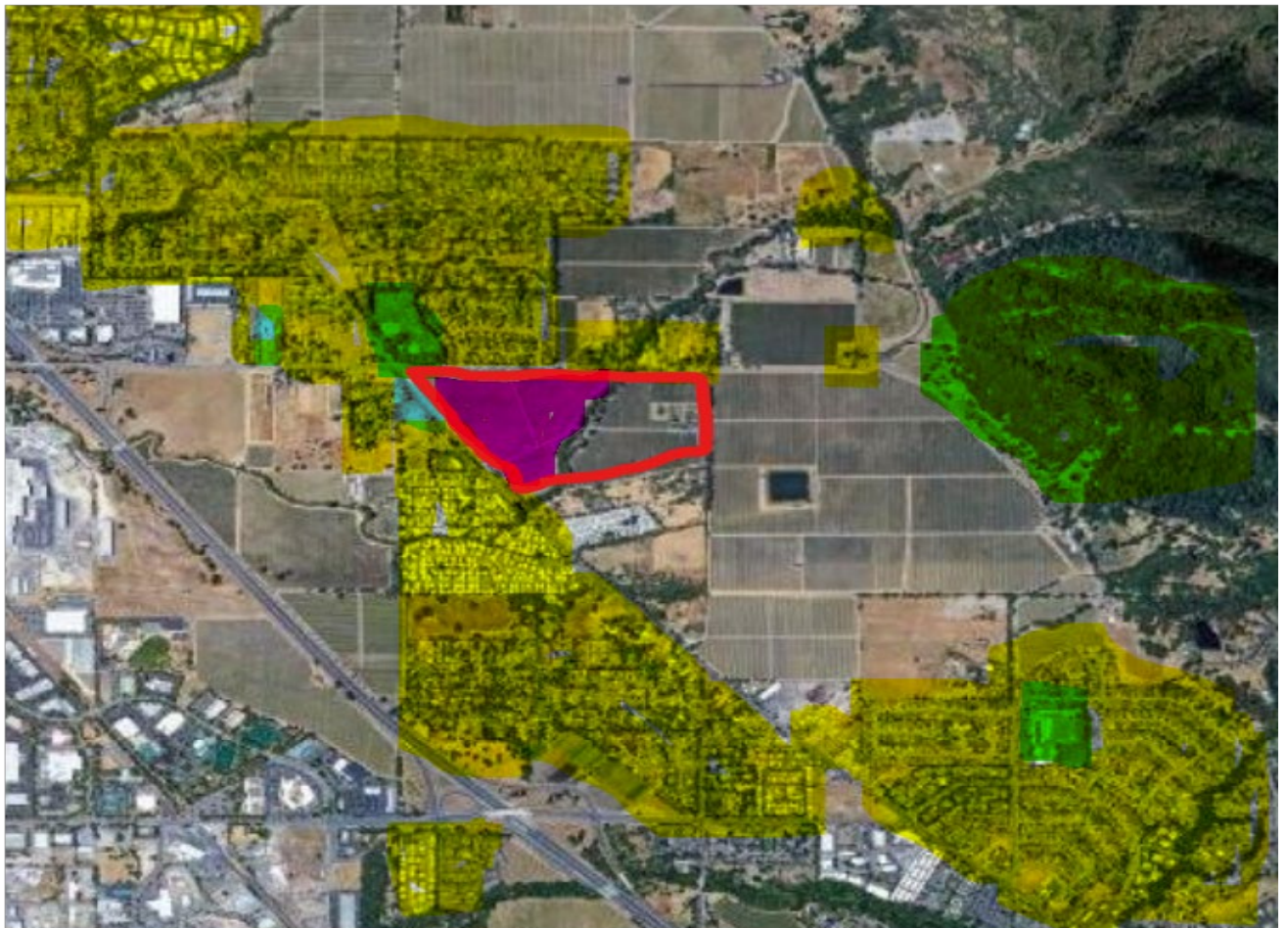
Lastly, if you look at the highlighted map, my home of 23 years sits directly adjacent to the parcel in question most likely less than 100 feet from the proposed buildings. Needless to say, this development will destroy our quality of life. The light, noise, buses and cars, 24 hours a day will be unbearable. Now with the published proposal, the value of my property has been decimated and our ability to relocate somewhere else in Windsor or the surrounding Sonoma County area, to a similar home, is now most likely out of our financial means. My wife has been an elementary school teacher in the Windsor Unified School District for over 20 years and we are saddened at the prospect of having to move after all of these years.

Please deny the Koi's request to put this property into trust, thus resulting in one of the largest casinos in the state of California, being built amongst family homes.

Kind regards,
Paul and Stephanie Browning
243 Lea St., Windsor, CA 95492
(707) 479-4508

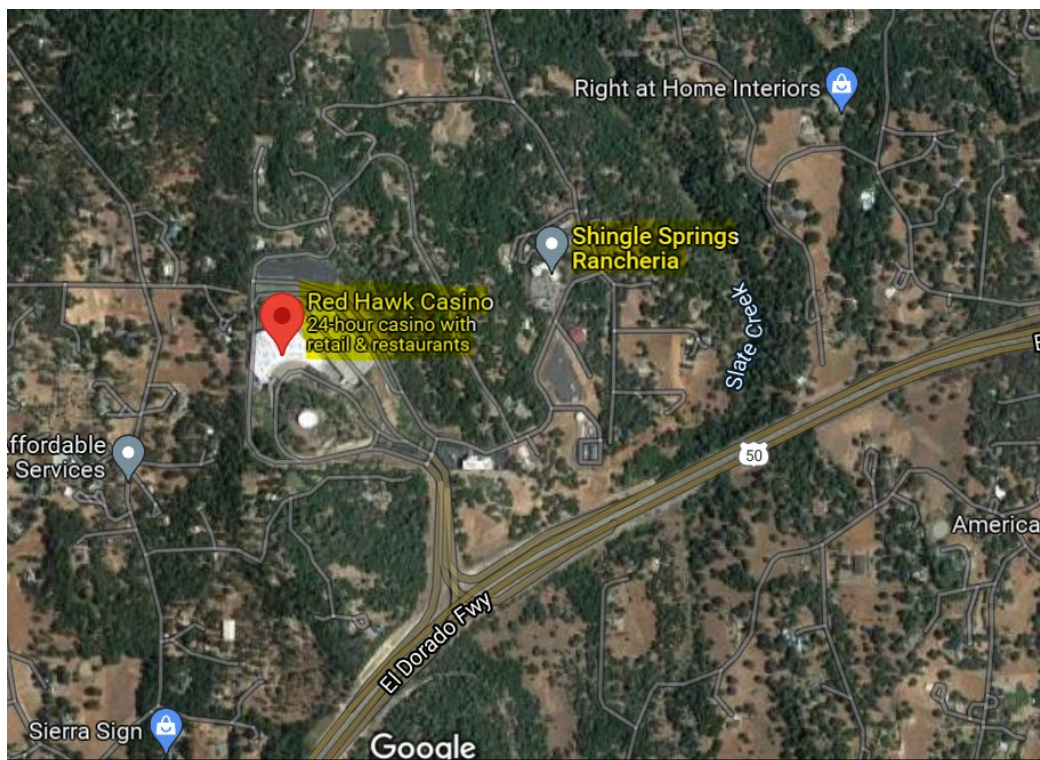


Shiloh Resort & Casino rendering courtesy of Koi Nation Sonoma

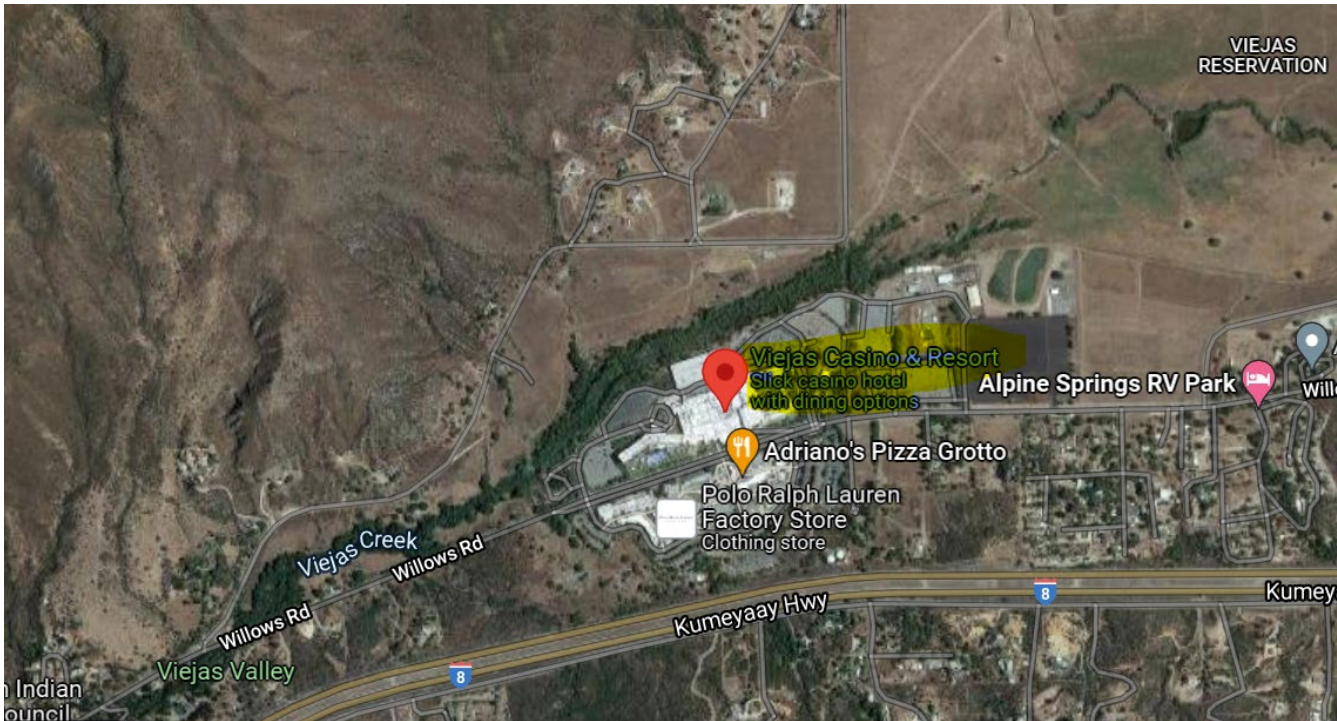




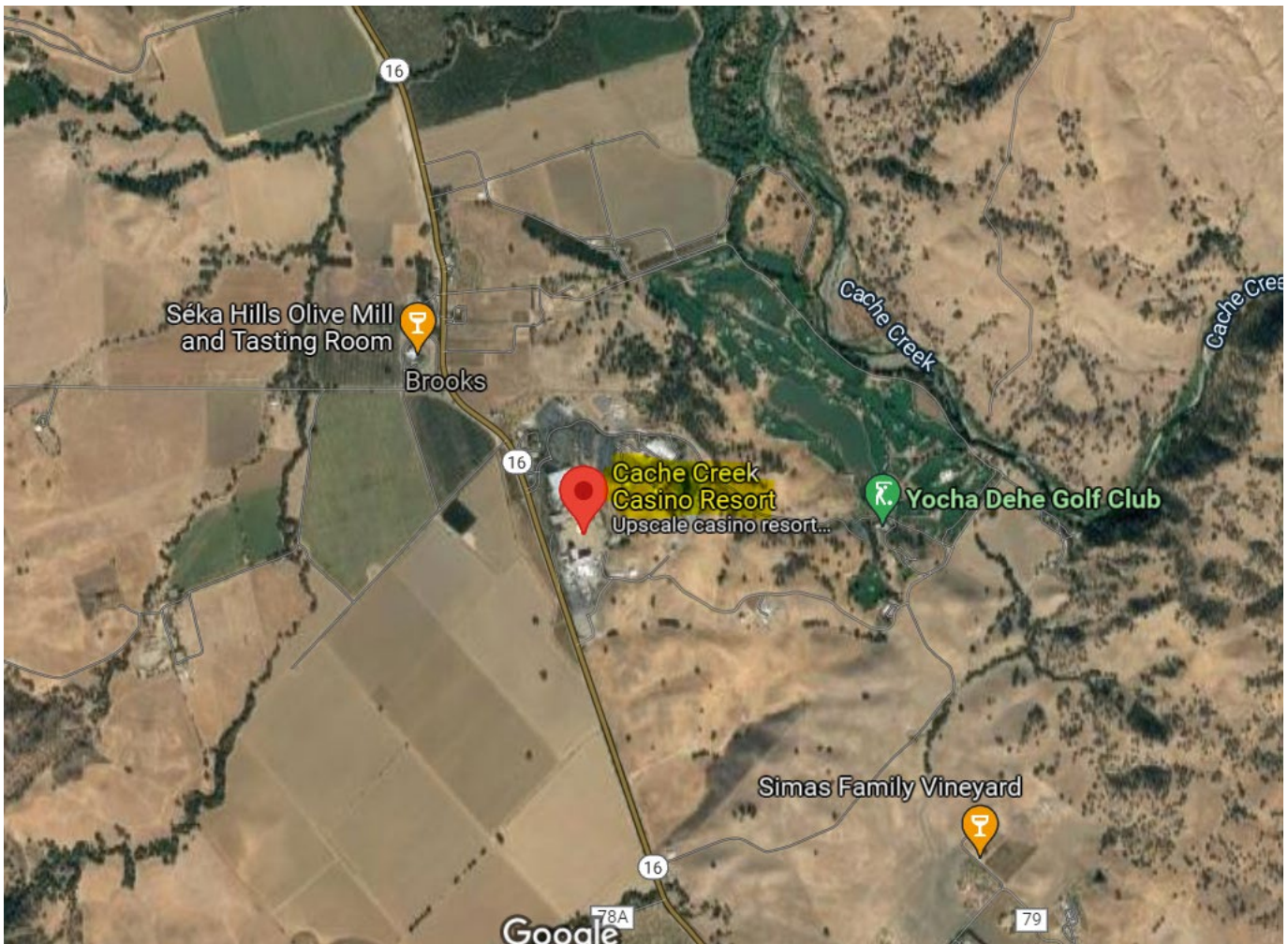
Redhawk Casino and Resort:



Viejas Casino and Resort:



Cache Creek Casino and Resort:



5. Cache Creek Casino Resort



#5 CACHE CREEK CASINO RESORT

14455 CA-16, Brooks, California 95606-0065 (800) 452-8181

Slot Machines: 2,700

Floor Size: 74,720 square feet

Table Games: 120 | Poker Tables: 14

Cache Creek Casino Resort is located 40 miles west of Sacramento in Brooks, California. The casino features ten restaurants, the Yocha Dehe Golf Club, and two four-star hotel towers with 659 rooms. [More information](#)

6. Viejas Casino & Resort



#6 VIEJO CASINO & RESORT

5000 Willows Road, Alpine, California 91901-1656 (800) 847-6537

Slot Machines: 2,500

Floor Size: 130,000 square feet

Game Tables: 50; Poker Tables: 22

Viejas Casino & Resort is located 35 miles east of San Diego in Alpine, California. Viejas features seven dining venues, an entertainment theater, a bowling alley, factory outlet stores and two AAA Four Diamond hotels. [More information](#)

7. Red Hawk Casino



#7 RED HAWK CASINO

1 Red Hawk Boulevard, Placerville, CA 95667 (888) 573-3495

Slot Machines: 2,500

Floor Size: 88,000 square feet

Table Games: 75 | Poker Room: 7 tables

Red Hawk Casino is located 30 miles east of Sacramento in Placerville, California. The casino features three restaurants and a food court, a Kids Quest entertainment center, fuel station and convenience store, and a 50-room hotel (2022). [More information](#)



June 17, 2022

Sent Via E-mail
tribalaffairs@sonoma-county.org

Board of Supervisors, Sonoma County, California
575 Administrative Drive, Room 100 A
Santa Rosa, CA 95403

Dear Board of Supervisors:

The Northern California Carpenters Union is responding to Sonoma County's June 8 request for public input to help frame the county's response to the Bureau of Indian Affairs concerning the Koi Nation of Northern California's proposed Shiloh Casino & Resort project on the Tribe's land at 222 E. Shiloh Road.

The Northern California Carpenters Union unequivocally supports the Koi Nation's project as proposed by the Tribe. This project will provide unparalleled opportunity and economic benefits to our members, to the members of the Koi Nation, and to Sonoma County and the communities adjacent to the project.

The Nor Cal Carpenters Union has a membership of over 37,000 skilled craftspeople, making us one of the largest organized voices in the Northern California construction industry. This project will provide family supporting union jobs with benefits including healthcare and pensions to hundreds of our members who live in and around Sonoma County. The project also will provide Sonoma County residents with the opportunity to obtain training in a skilled trade, one that can provide them with the same solid economic future that this project offers to the Koi Nation. The project also will provide more than 1,000 permanent jobs to local residents once it is in operation.

As a union whose members have worked on countless projects in the area, we also have rarely seen a project of this scope that is so well designed to fit into the landscape and respect the natural features of the land. It is clear that the Koi Nation is maintaining its traditional respect for the land and nature at the same time as it creates economic benefits for the county.

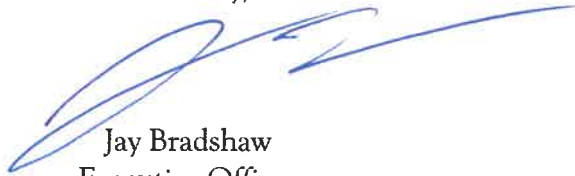
Finally, at its heart this project is about equity for the Koi Nation and its members. For their own selfish reasons, the opposition to the project is seeking to prevent the Koi from deriving economic benefits from their land following an approved federal environmental process.

This is a sorry repetition of the historic injustices done to the Koi people, who have suffered the dispossession of their lands for more than 150 years. This runs absolutely counter to the public policy of Sonoma County, which formed an Office of Equity in 2020 and created a

Racial Equity and Social Justice pillar in the County's strategic plan, with its initial focus on racial equity. As a union whose membership represents a diverse workforce, we support the County's equity policy and the Koi Nation's efforts to obtain economic equity through the Shiloh Casino & Resort project.

For the benefit of working men and women in Sonoma County, for the economic benefits that will accrue to the County overall, and in the interest of upholding the County's equity for the Koi Nation, we urge Sonoma County's full support for the Shiloh Casino & Resort project.

Sincerely,



Jay Bradshaw
Executive Officer
Nor Cal Carpenters Union

From: [KEVIN WARREN](#)
To: [TribalAffairs](#)
Subject: Casino on Shiloh
Date: Friday, June 17, 2022 7:55:17 PM

EXTERNAL

Greetings!

I am strongly opposed to the Casino that is being wished for on Shiloh road by the Lake County Koi tribe

This casino will have a huge negative impact on the community. Traffic will be a huge negative impact to the area and with wildfires a continual threat the potential escape routes disasters are just waiting to happen like the Paradise fire where people were burned in their cars trying to flee. There is a huge water crisis that will only increase with this type of uncontrolled development. This area is part of the open space/green belt area that separates Santa Rosa from Windsor. Right out the back door of Windsor neighborhoods this Casino will increase crime, noise and quality of life for thousands.

Besides all the negative effects on the community the Koi tribe is from Lake County and are reservation shopping in the name of a 90 member tribe. This type of reparation for the tribe is a greedy money grab that should be stopped. We have casinos in Sonoma County already that are from tribes that are from the area. The Native American tribes in Sonoma County should not have their areas encroached by an outside tribe with the government help.

Please stop this casino disaster.

Thank you,
Kevin Warren
6181 Lockwood Dr
Windsor, CA

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From: [Geoff Coleman](#)
To: [TribalAffairs](#)
Cc: ourcommunitymatters2@gmail.com
Subject: Casino Opposition Letter
Date: Friday, June 17, 2022 7:37:48 PM
Attachments: [Casino.pdf](#)

EXTERNAL

Representatives for Sonoma County,

I am writing today to express concern, as a 38-year resident of Sonoma County, a registered professional engineer, a licensed land surveyor and college engineering/land planning professor, about the casino proposed along east Shiloh Rd in the unincorporated area of Sonoma County. I am not opposed to the concept of a casino, but am bewildered how any responsible entity could consider urban development at this location, let alone a casino of this magnitude. This is a selfish and blatant disregard to the environment, neighborhood and our community.

The County of Sonoma and Town of Windsor, which this proposed monstrosity of a development borders, have active policies in place that prohibit development of this nature. The land use designation in the Sonoma County General Plan "Land Intensive Agriculture" was created to enhance and protect lands best suited for permanent agricultural use. These policies are established to promote responsible growth and prevent urban sprawl in accordance with the Local Agency Formation Commission's (LAFCO) policies.

It would be an irresponsible violation of these policies and completely inappropriate to build a casino in a residential area with our families and schools, inviting crime, drugs and prostitution, particularly when the residents of Sonoma County relied upon these policies and the actions of our Board of Supervisors approving them when purchasing their homes and nesting in this area. A development of this nature is not allowed under the California Environmental Quality Act (CEQA) and would not be permitted if proposed by any other entity, so I'm astonished that this is even being considered. In summary:

-[if !supportLists]--> <!--[endif]-->The casino would bring crime, drugs and prostitution, threatening the safety of our community and degrading property values.

-[if !supportLists]--> <!--[endif]-->The casino would introduce unwelcome noise, odors and light pollution which violate the County's policies.

-[if !supportLists]--> <!--[endif]-->Shiloh Road is currently operating at a Level of Service of "D". The Press Democrat noted that the casino would bring 1,100 employees and draw 20,000 people a day, degrading the Level of Service to an unacceptable level.

-[if !supportLists]--> <!--[endif]-->California now evaluates the environmental impact of a development based on the number of vehicle miles traveled when accessing a facility (VMT). Adding 1 vehicle a day for an unplanned land use would violate this policy. The casino will bring 20,000 people a day, substantially increasing VMT and greenhouse gas emissions.

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-[if !supportLists]--> <!--[endif]-->Sonoma Water and the Town of Windsor provide sewer service to the

unincorporated area of Sonoma County and the residents of the Town. Their facilities do not extend, nor were they ever planned to accommodate the waste discharge from the casino. Therefore, the casino would have to build their own sewage treatment plant in the back yards of our residents, bringing unsightly facilities and unwanted odors.

-[if !supportLists]--> <!--[endif]-->The Town of Windsor and California American Water provide potable water service to this area for drinking, irrigation and fire protection. Their facilities do not extend to, nor were they ever planned to serve this site. Therefore, the casino would have to drill their own well(s) and further diminish groundwater supply in this area. California American Water uses wells in this area to serve the existing residents and would be forced to compete for this water, drilling deeper wells and passing these costs along to existing residents.

-[if !supportLists]--> <!--[endif]-->The casino is proposed immediately adjacent to a Wildland Urban Interface Area (WUI). We have observed two devastating fires in this immediate area in the last 5 years. Residents attempting to flee their homes during the Tubbs fire, which took more than 5,600 structures in a matter of hours, were grid-locked in traffic trying to lead their families to safety, down the only viable evacuation route for many local residents. The Casino will eliminate an existing agricultural greenbelt and provide additional strain on our roads and ability to seek refuge during emergency events.

-[if !supportLists]--> <!--[endif]-->Although Sonoma County residents are in dire need of housing, Permit Sonoma won't allow a residential lot to be split to build another home within a WUI area as a life/safety precaution, but these folks want to build a casino?

-[if !supportLists]--> <!--[endif]-->The local water supply network is designed to provide approximately 1,500gpm for firefighting. California American Water's tanks ran dry when fighting the Tubbs fire. A development of this magnitude having wood framed construction would require a flow rate of 8,000gpm (4,000gpm for sprinklered buildings). The local water purveyors don't have the capacity for this or the infrastructure to support this flow rate. Therefore, the casino will need to build their own tank or tanks which may require more than 500,000 gallons of water if computed using NFPA1142. However, this code wasn't intended to be used for sizing firefighting facilities in an urban design setting. When considering the California Fire Code, the water tank storage requirement could approach 1 Million gallons, even for sprinklered buildings.

-[if !supportLists]--> <!--[endif]-->Pruitt Creek traverses the proposed casino property. Even if the property could be developed, our local land development policies require that the creek be preserved and enhanced with landscape and development be setback from the creek.

-[if !supportLists]--> <!--[endif]-->Sonoma Water, our local flood control agency and the Town of Windsor, in their Stormdrain Master Plan, identify Pruitt Creek as being incapable of handling the design storm event. The existing mobile home park and other downstream residents already experience flooding during inclement weather. The northbound Shiloh Road off ramp at Hwy 101 also floods and experiences closures on a regular basis. Substantially increasing the amount of impervious surface upstream, at this site, will add runoff and create exacerbate flooding. A development this size might generate as much as 100 cubic feet of water per second which is approximately 45,000 gallons per minute. This might require a 2-acre detention basin to help offset and mitigate the additional runoff, inviting mosquitos and other vector borne diseases.

-[if !supportLists]--> <!--[endif]-->The Russian River and its tributaries, including Pruitt creek are listed as impaired water bodies under the Clean Water Act. The State of California requires that development draining to these tributaries treat and infiltrate stormwater. A development this size could require 4-acres of bioretention, aside from the requirement to temporarily detain the peak runoff to help mitigate flooding.

As may be gleaned from the summary above, Shiloh Road is the wrong place for a casino, creating an unsafe environment for our residents on multiple levels.

Respectfully,

Geoff Coleman PE, PLS, CDT

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From: [Nancy Thomas](#)
To: [TribalAffairs](#)
Subject: Koi Casino
Date: Friday, June 17, 2022 6:01:50 PM

EXTERNAL

Sonoma County does not need another casino. The casino has no significant connection to this land in Sonoma County by the Koi Nation. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here. This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site. The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and a busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

I hope the supervisors of Sonoma County will not allow this casino to be built. It is unfair for the people who live in a rural area and who live here.

Sincerely,

Lon & Nancy Thomas
9108 Loch Haven Drive
Santa Rosa, CA 95404

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From: [Katherine Schram](#)
To: [TribalAffairs](#)
Subject: Koi Nation Casino
Date: Friday, June 17, 2022 5:54:00 PM

EXTERNAL

To Whom It May Concern,

I strongly oppose the Kio Nation Shiloh Resort and Casino Project.

I oppose the project for multiple reasons but my primary concerns are:

1) This is area has had multiple fire evcuations the past 5 years. The significant number of additional cars funneling into a small country road could certainly cause fatalities.

2) This project will destroy a family neighborhood. Would you want a Casino built next door to your neighborhood? This project benefits a small number of individuals from another region, while wrecking peoples community.

Thank you,

Katherine Schram

7335 Shiloh Ridge
Santa Rosa, CA 95403

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From: [Maureen Granados](#)
To: [TribalAffairs](#)
Subject: New proposed casino
Date: Friday, June 17, 2022 8:01:13 AM

EXTERNAL

To Whom It May Concern,

I am strongly opposed to the new casino proposed for Shiloh road. We already have River Rock and Graton, and there is absolutely no need to impact that area with another needless casino.

If the tribe would like a new casino, I suggest we put it in the middle of the reservation, and then see what the feedback is for future casinos.

Thanks,

Maureen Granados

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From: [Alejandra Salgado-mendez](#)
To: [TribalAffairs](#)
Subject: No casino in Windsor
Date: Friday, June 17, 2022 4:35:41 PM

EXTERNAL

To whom it may concern.

Please do not put a casino in our beautiful Windsor town.

What we need is more things for young people and children to do not gambling casinos.

Create jobs in a different way but not drinking and gamboling please. Please no casino.

Thank you

Windsor resident for over 30 years.

[Sent from Yahoo Mail for iPhone](#)

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From: [susan pulcheon](#)
To: [TribalAffairs](#)
Subject: Opposition to Koi Nation Shiloh Resort
Date: Friday, June 17, 2022 11:11:25 PM

EXTERNAL

To whom it may concern:

I am adamantly opposed to the proposed Koi Nation Shiloh Resort being built WHERE it is proposed with ALL of the adverse effects it will have on the existing community.

The risks and resulting adverse effects range from increased wildfire risk to the inappropriate proximity to schools to the loss of open space/greenbelt lands to the clearly very negative environmental/societal impact overall to our current DIRE drought situation, challenge to public safety, exponential increase in greenhouse gases and a decline in property values.

PLEASE seriously reconsider the approval of this VERY shortsighted and community damaging project.

Thank you for your time.

Susan Pulcheon

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From: [Jennifer Hainstock](#)
To: [TribalAffairs](#)
Subject: Opposition to proposed casino in Windsor
Date: Friday, June 17, 2022 1:35:16 PM

EXTERNAL

County of Sonoma,

I'm writing to express my strong opposition to the proposed casino in Windsor. I live in Santa Rosa, and work near the airport. I have driven down the road where the proposed casino would be built, and into the residential neighborhoods.

This is the wrong location for such a large project, and I believe it should be located in more of an industrial area (like the Graton Casino). I am also opposed because it will mean paving over what is now agricultural land; and I'm worried about the quality of life issues for the animals and humans who live in that neighborhood - not to mention traffic, the impact on those small roads, and water availability.

I also understand the zoning would need to be changed; something that should be done in rare circumstances and for projects that are for the public good - for example for police and fire stations, community centers etc.

Thank you for your consideration.

Sincerely,

Jennifer Hainstock

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From: [Dorisann Regan](#)
To: [TribalAffairs](#)
Subject: Proposed Casino Site
Date: Friday, June 17, 2022 6:18:10 PM

EXTERNAL

[Sent from AT&T Yahoo Mail for iPhone](#)

Begin forwarded message:

On Friday, June 17, 2022, 12:49 PM, Dorisann Regan <danddregan@sbcglobal.net> wrote:

Dear Sonoma County,
I strongly oppose the proposed casino location! I feel that we have too many casinos already. Present and proposed casinos are too close to residential neighborhoods, impose on wildlife, impact our traffic on our roads, impact public safety (especially emergency response times), and contribute to greenhouse gases and negative ecological impacts on the areas. Please do not support yet another casino in our area. Thank you.
Respectfully yours,
Dorisann Regan

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From: [MEREDITH STROM](#)
To: [TribalAffairs](#)
Subject: proposed casino
Date: Friday, June 17, 2022 1:51:47 PM

EXTERNAL

I am adamantly opposed to the casino proposed on Shiloh Road in the Windsor area. I live one block off of Shiloh Road on Mathilde Drive, a quiet residential area of homes owned mostly by older citizens who have lived here for years. We will be across the road from this casino.

I have had to evacuate twice in the last two years due to wildfires I could see burning from my front door. Shiloh Road is the only access road between US 101 and several rural roads running along the hillside behind us. During these evacuations, Shiloh Road was backed up and stopped all the way to US 101 which is the only north/south through road in this part of the county. Emergency vehicles could not get through to the fires nor to assist people in need. I am 76 years old and need assistance when evacuating and my kids could not get to me to give that assistance. Imagine the increased risk and danger if traffic from employees and visitors to the casino are added to this situation.

With the exception of US101, almost all roads in this area are two-lane rural roads with heavy traffic. They are not well kept up and this increased traffic will only add to their failing condition. There are three elementary schools and several churches along with numerous mobile home parks within a mile or two of the proposed site. Traffic is gridlocked during drop off and pick up times for the schools. A casino, with its increased traffic, noise and possible crime will not be a good fit in this neighborhood.

The wine country, and Sonoma County specifically, is a destination for many bike races, triathlons, cycling club events and just pleasure riding. Nearby Shiloh Regional Park is home to mountain bike trails. Literally hundreds of these riders gather at Esposti Park, which is on the corner of Shiloh Road and the Old Redwood Highway, to begin their rides on a weekly basis. It is also a much used park for youth athletic teams and parking is at a premium, including on the shoulder of Shiloh Road all weekend and in the evenings, year around for soccer, youth football, baseball and other activities.

We bought our homes because this is a quiet area that backs up to open space and vineyards, believing the zoning would not allow anything to change that. What is to be almost certain 24 hour increase in noise will completely disrupt our lives, to say nothing of the decrease in our property values if we find we can not tolerate the traffic, noise, increased crime, light pollution, etc. and need to sell to relocate. I feel totally bullied and aggrieved that I might be expected to pay the price out of my retirement pension so that a casino can be built in an area not zoned for it and totally inappropriate for it.

Of further frustration for me is that the Koi Tribe that is pushing this casino has no legal or moral right to claim a connection to this land. This is evidenced by the fact that five other tribes in this immediate area have expressed their opposition to the project.

Water is a constant concern for this area. This is the third year in a historic drought and produces increased fire risk. All Sonoma County residents are currently on mandatory water rationing. Adding this huge casino is going to negatively effect the water table as it draws massive amounts from the water table. This will effect not only those of us just across the road but for miles around.

We also experience periodic power outages. I can't image how much this tremendous power driven casino will add to that problem.

I appreciate your careful study of all the issues surrounding the proposed casino that will produce your expressed opposition to the project.

Meredith Strom
5825 Mathilde Road
Windsor, CA 95492

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From: [Paul Browning](#)
To: [TribalAffairs](#)
Subject: Proposed Koi Casino Development
Date: Friday, June 17, 2022 1:51:36 PM
Attachments: [Koi Nation Casino Proposal Sonoma County.docx](#)

EXTERNAL

Dear County of Sonoma,

Please see and record my attached correspondence in regards to the proposed Koi Casino development on Shiloh Road.

Kind regards,
Paul Browning

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From: [Ricky Score](#)
To: [TribalAffairs](#)
Cc: dbeltran@koination.com
Subject: Sonoma County Public Response
Date: Friday, June 17, 2022 1:16:00 PM
Attachments: [SNCCRC Mail22061711051.pdf](#)

EXTERNAL

Good afternoon,

Please see the attached letter from the Nor Cal Carpenters Union regarding the Shiloh Casino and Resort. Thank you, and have a wonderful day.

Best,
Ricky Score
Executive Representative
(510)568-4788 ext. 304 Office
(510)502-0681 Cell

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From: [Richard Addison](#)
To: [TribalAffairs](#)
Subject: Concerns about a Casino on Shiloh and Faught
Date: Saturday, June 18, 2022 2:15:17 PM

EXTERNAL

To whom it may concern,

I'm writing to express my concern at the possibility that a gaming casino would be built on Shiloh Road, near Shiloh Ranch Regional Park, major bicycle routes, and close to residential areas. It is quite clear that this would be the wrong place for a casino due to traffic, congestion, noise pollution, and the difficulty of egress in case of another fire. Plus a casino would be a certain way to destroy such a beautiful, quiet, natural setting.

My hope would be that a different location can be found, somewhere far less problematic.

Thanks for hearing these concerns,

Richard B. Addison, PhD
862 Third Street
Santa Rosa, CA 95404
Office Phone & Voice Mail: 707-576-9813

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From: [brian bollman](#)
To: [TribalAffairs](#)
Subject: Koi Casino Proposal
Date: Saturday, June 18, 2022 4:33:06 PM

EXTERNAL

To whom it may concern,

The location for the Koi Casino proposed on Shiloh Road southeast of Windsor, CA, is in a rural area that is currently in vineyards, and near to an open space park loved by local people. It is not an appropriate place for development, and a casino or other non-rural development is not compatible with the Sonoma County General Plan. County planners did not and could not have anticipated this kind of development in this area, and thus the area does not have the infrastructure necessary to support such a development. A development in this area may have considerable negative impacts on people living within a wide radius of the project, as well as people trying to use the nearby open space park. This development is likely to have detrimental affects on the local environment. It would also contribute significantly to global warming. Since this type of project is not needed in the area, it seems like an inappropriate choice.

Thank you,

Brian Bollman

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From: [Eric Lucas](#)
To: [TribalAffairs](#)
Subject: KOI Casino
Date: Saturday, June 18, 2022 10:51:49 AM

EXTERNAL

To Whom it May Concern,

I'm writing to express my opposition to the proposed casino at Old Redwood Highway and Shiloh Rd. There are numerous problems with this casino:

- The site of this proposed casino is much too close to residential areas
- We're in the middle of a drought with water rationing already in place, and somebody thinks it's a good idea to build a giant facility/hotel which will use more of our precious water?
- We already have enough casinos in the area. We don't need another, and honestly, the world doesn't need another casino. Casinos do nothing for the betterment of society.
- Our roads are not sufficient to handle the additional traffic this casino would bring.
- Casinos bring crime. Our neighborhood is quiet and safe, let's keep it that way.

I could keep going, but it should be obvious to any sensible person that this casino doesn't belong here.

Regards,
Eric Lucas
Wikiup

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From: [DON ZISKIN](#)
To: [TribalAffairs](#)
Subject: Koi Nation Resort and Casino Project
Date: Saturday, June 18, 2022 7:52:03 AM
Attachments: [image.png](#)

EXTERNAL

My husband and I moved to Windsor in 1992. When we moved in the area where the Koi propose to build the casino was an open, undeveloped lot. My children grew up playing in the field and in the creek running through the property. I am writing this letter in strong opposition to the Koi's proposed casino resort project. This is not the right location for a project this large. The infrastructure has reached capacity and is not capable of sustaining the volume of traffic at the proposed casino.

This is a relatively dense residential area with occasional vineyards and small businesses. The idea of a huge casino, hotel, convention center complex drawing thousands of guests, employees, delivery drivers, vendors daily directly across the street from multiple neighborhoods and homes is unfathomable.

I have been through the Tubbs Fire and the Kincaid Fire and have been stuck in evacuating traffic both times. The idea of having to share the road during an evacuation with the volume of people coming from the casino is scary! This is not the right location for a project such as this.

While there are numerous concerns, the two most important to me are the risk of injury and loss due to fire and evacuation problems and the lack of water. There are limited evacuation routes out of this area. It is a rural area with one lane roads in all directions. Please have the BIA explore risks from fire and evacuation.

We are also experiencing and unprecedented drought with no relief in sight. There is no way this area and the local aquifers can sustain the demands of the Koi casino project.

East Shiloh Road at Old Redwood Highway starts with Espositi Park. Heading east it is a single lane road ending at Shiloh Regional Park and the entrance to a housing community in the Mayacamas mountains. is frequented by bike riding clubs, walkers, and hikers. Espositi Park is home to boys' and girls' sports leagues, adult sports leagues and walkers and dog walkers and more. The idea of Espositi Park and the residents of Oak Park being the entrance/exit of this resort is overwhelming. Aside from noise and light pollution, the potential for crime is scary.

Other concerns include damage to local wildlife and the local environment/habitat. The light and noise from the casino resort will impact breeding and feeding habits. This area is a designated critical habitat. There will be an increase in greenhouse gases further impacting the environment and local residents' health. Home values and marketability are also at risk.

Please help preserve our residential neighborhood.

Denise Ziskin

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From: dianaborges101@att.net
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project Opposition/Scoping Comments
Date: Saturday, June 18, 2022 9:45:26 AM

EXTERNAL

To Whom It May Concern,

I am writing to express my opposition to the Resort Casino that is being pursued for the corner of Old Redwood Highway and Shiloh Road by the Koi Nation and to provide comments to their submitted Notice of Preparation for an Environmental Assessment/Tribal EIR. I am also requesting the 30-day public comment period be extended so that more individuals can be notified and have the opportunity to comment.

I found out about the NOP and comment period when a friend emailed me on June 14th, only 6 days prior to the deadline. Although publishing about the NOP/30-day comment period only in the Press Democrat satisfies NEPA requirements, we know the Press Democrat has many less readers than it once did. It is only this week that information about the NOP/comment period is being posted on social media platforms, such as Facebook and NextDoor. In addition, the comment period opened right before Memorial Day weekend, when many people were out of town. Considering the scale of this project and the lack of notification distribution, it seems appropriate to extend the comment period. I question whether these types of notifications published only in local newspapers is sufficient anymore.

The Casino is anticipated to be at least as large as Graton Casino, which has about 10 million visitors per year. But Graton Casino is located in a commercial area not an urban/community-related area like the property in question. Below are my major comments and questions regarding the proposed development.

Proximity to Residential Neighborhoods, Churches, Parks and Schools

The proposed Resort Casino is too close to residential areas, churches, parks and schools and is not an appropriate location, especially for a 24/7, yearlong business of its scale. In the immediate vicinity, are at least two churches, several residential areas and two parks. At least two schools are within a one-mile radius. These areas are used by both adults and children. How will the development impact the quality of life on these areas, including the construction activities, increased vehicular traffic, light pollution, increased noise levels, potential crime, drunk drivers leaving the casino and likely decreased property values? There are many examples of how an area transforms from community-oriented/residential to commercial once a development like the casino has been built.

Infrastructure Roads

Old Redwood Highway, Shiloh Road and Faught Road, which would be the access roads to the Casino are one-lane roads, without the option for widening. The highway overpass on Shiloh Road is also one-lane each direction. How will the roadways accommodate the number of construction vehicles, worker vehicles, delivery vehicles and visitor vehicles that are anticipated? It is my understanding that about 27,000 additional vehicles to this area daily are anticipated during operation. These roads are also used for annual bike races, triathlons and other cycling purposes. How will the increased traffic impact use of these roads by cyclists?

Three Casinos in Sonoma County

Construction of the casino would be Sonoma County's third casino. Three large casinos in our area does not seem sustainable. If one of the three casinos closes, how will its closure impact that area, ie vacant structures, loss of traffic to businesses, jobs and more?

Drought, Water Supply and Groundwater Recharge

We are in extreme drought years with no sign of relief. How much groundwater extraction will be necessary to operate the Casino and what impacts will it have on the aquifer? The existing vineyards require significant water during their growing season but not year-round. Structures and parking lots would replace the existing vineyard, which now help with groundwater recharge. What will be the decreased percentage of groundwater recharge if the vineyard is replaced with impermeable material (structures and parking lots)?

Wildfire Risk

I am one of the leaders for COPE (Communities Organized to Prepare for Emergencies) and had to evacuate in 2019. We are in a high wildfire risk area. The vineyard which is currently present on the land is known to slow the spread of wildfires. How will removal of the vineyard impact the spread of potential wildfires.

Emergency Response Time and Evacuations

I am extremely concerned about the impact the Casino will have on evacuation times, traffic flow and emergency response times for wildfires and earthquakes. During the 2019 Kincadee evacuation for the entire Town of Windsor, it took a friend who lived near Foothills Park 1.5 hours to reach Highway 101. I personally had to wait at the intersection of Old Redwood Highway and Shiloh Road for an uncomfortable amount of time during the evacuation. The increased number of anticipated vehicles will cause additional delays/gridlock for traffic flow. How will the increased traffic (projected 20,000 visitors a day plus employees, vendors, delivery drivers, etc.) impact evacuation routes, emergency response times and the safety of residents?

Impacts of Changing Zoning

The Casino will include tall structures that will change the area aesthetics, especially for the people who already live nearby and those visiting Shiloh Park and Esposti Park. The proposed Casino would be on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. The property serves as a riparian corridor, Valley Oak habitat, open space and greenbelt. What will be the impacts of rezoning the 68 acres and loss of the vineyard to accommodate the Casino?

Public Safety

Data supports the fact that crime (drug use, guns and violent crime) increases in areas that have casinos. Esposti Park and Oak Park subdivision are on the opposite side of Shiloh Road and less than 50 feet from the proposed site. The park is used by neighborhood families for recreation and sports leagues for children. Due to the location of the Casino, this park would probably attract drug users, prostitution and/or property crime. This would make the park unsafe to visit and for the families that live in this neighborhood. This would likely then cause many of the residents in the area to move to a more desirable, safer location, possibly out of Sonoma County.

No Significant Connection to the Land by the Koi Tribe

The Koi Tribe is a Clearlake County Native American Tribe. This is the third county outside of their historical land in Clearlake the Koi have tried to build a casino. As stated on Sonoma County's own website for this issue "All five federally recognized Sonoma County tribes and the County of Sonoma itself, have written letters in opposition or released resolutions in opposition to the Koi Nation's application to take lands into trust in Sonoma County, where they have no ancestral ties."

Thank you for considering my concerns and extension request. I hope you conclude the proposed location is not appropriate for a Casino and act accordingly.

Diana Borges
179 Dartmouth Way
Windsor, CA

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From: [Nina Cote](#)
To: [TribalAffairs](#)
Cc: [Nina Cote](#)
Subject: Opposition to Proposed Location for Casino
Date: Saturday, June 18, 2022 10:22:03 AM

EXTERNAL

I live in the neighborhood immediately across from the proposed casino site. I have been adamantly opposed the project since the announcement. This location is inappropriate for many reasons.

There is no significant connection to the land by Koi - The Koi Tribe has been and is a Clearlake County Native American Tribe. Our local Sonoma County Tribes are united in their opposition of a non-Sonoma tribe building a casino in Sonoma County.

My immediate response when hearing the property was going to have a proposed mega casino was, we are going to die in a wildfire. My neighbors and I have evacuated twice for wildfires in our area. We have experienced gridlock in the past and the thought of adding conservatively, 20,000 more vehicles, 24/7, DAILY, to Shiloh Road, Old Redwood Highway as well as other of our roads is absolutely unacceptable!

My family has lived in this area for over 20 years and moved here because of it being rural, quiet, the wildlife, the parks close by, the wonderful small community and being surrounded by beauty. Adding 20,000 people a day directly across the street equates to adding the entire population of Windsor to our immediate living area where we walk, drive, hike, bike, sleep and enjoy our lives. Basically, turning 1000's of residents of Santa Rosa and Windsor's lives upside down.

Here are some of the many issues with a casino being built in this location.

Ignoring Current Zoning Restrictions
Youth Sport Leagues immediately across the street
Community Residents Well-Being
Water Rationing/Drought
Highway 101
Staffing Challenges in this area
Public Safety
Noise pollution
Negative Ecological Impact
Mudflow Evacuation
Loss of Open Space
Loss of Scenic Corridor and decrease in Green Belt Space
Loss of Riparian Corridor
Loss of Night Sky due to Light Pollution
Loss of Flood Plain
Loss of Property Values
First Casino to be build this close to a residential neighborhood
Lack of Power/Outages
Inappropriate Scope of Project
Wildlife
Flood Plain
Removing Natural Fire Break
Emergency Response Times when competing with additional traffic
Increase of Drunk Drivers
And, the list goes on.

Please communicate to the BIA that this site is WRONG for so many reasons!!!!

Thank you for representing your community members.

Sincerely, Nina Cote'
Sonoma County Resident

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From: [Valerie Zanette](#)
To: [TribalAffairs](#)
Subject: *Please* Don't Build a Casino in Our Peaceful Community
Date: Sunday, June 19, 2022 5:55:10 PM

EXTERNAL

Hello,

I am a proud homeowner and I am thoroughly opposed to this casino project.

I agree with ALL of the examples below:

- Proximity to Residential Neighborhood, Churches, Schools
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Public Safety
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases
- Decline in Property Values
- Wildfires

Thank you,
Valerie Zanette
Savannah Way

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Valerie Zanette
Savannah Way

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TO:

Chad Broussard @ BIA
Tribal Affairs, Sonoma County
Sn McGuire
City of Windsor Town Council

From: Bob and Nancy Jenkins
June 19, 2022

We were shocked and appalled at the prospect of a third casino in our county. We strongly oppose development of the proposed Koi Casino on East Shiloh Avenue in Santa Rosa, California for the following reasons:

The Sonoma County Board of Supervisors voted unanimously to oppose the proposed casino. The Board said in a statement that the Koi are a "non-Sonoma County tribe." The board said it came to the decision based on letters of **opposition from five other Sonoma County tribes: The Kashia Band of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Cloverdale Rancheria of Pomo Indians, Federated Indians of Graton Rancheria and Lytton Band of Pomo Indians.** All five federally recognized Sonoma County tribes and the County of Sonoma itself, have written letters in opposition to the Koi Nation's application to take lands into trust in Sonoma County, where they have no ancestral ties.

Sonoma County doesn't need another casino. The planned **casino** would sit only about 18 miles from the River Rock Casino and a mere 13 miles from the Graton Resort and Casino.

The casino will bring **traffic, pollution, crime and lowered property values** to a substantial area of northeast Sonoma County.

The surrounding neighborhoods have been evacuated multiple times each of the past four years. Those evacuations have resulted in total gridlock scenarios due to dense surrounding residential neighborhoods on East Shiloh Road and limited escape routes in the immediate area. Adding the casino users— hotel, spa, 6 restaurants and 2000 employees— would create a **death trap in a wildfire.**

This project will result in huge **water and sewer impacts.** The infrastructure which was not designed for this kind of Use. The area was designed to support residential and agricultural use, and that is how it is currently zoned.

We hope that you will deny this project and/or reconsider its location.

Sincerely,

Bob and Nancy Jenkins
Sebastopol, CA

From: [Rachel Mercedes Verdugo](#)
To: [TribalAffairs](#)
Subject: CASINO ,NO ,PLEASE, THANK YOU I
Date: Sunday, June 19, 2022 12:36:54 AM

EXTERNAL

Rachel Mercedes Verdugo

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From: [Michael Cote](#)
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Sunday, June 19, 2022 10:30:37 AM

EXTERNAL

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the National Environmental Policy Act review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full environmental impact analysis with enough time for the public to meaningfully participate at each stage of the process.

Building a casino resort in a habitat corridor and adjacent to residential neighborhoods is inappropriate.

Wildlife and Habitat Conservation - As a frequent visitor to parks throughout the Mayacamas Mountain Range, I've been fortunate to see a wide variety of wildlife in their habitat. As climate change progresses, the green-belts surrounding and connected to this range must be protected to maintain the resilience of the ecosystem. The creeks that run through the proposed casino resort property support wildlife including river otter. Wildfires in 2017 and 2019 destroyed habitat within short distances of the proposed casino resort, property that is intimately connected to the adjacent forest.

Drought - Of the last eleven years Sonoma County had endured 8 years classified Abnormally Dry, 6 years of Moderate Drought, 3 years of Severe Drought, and 1 year of Extreme Drought (<https://droughtmonitor.unl.edu/CurrentMap.aspx>). Growth and water use impacts in the area must be carefully considered and managed responsibly.

Infrastructure - I grew up in the Santa Clara Valley in the 1960's and watched agricultural land converted to asphalt. Roads were widened and massive intersections were built to collect traffic. Not a single orchard remains in the area I grew up. Today I live along East Shiloh Road. A two-lane road lined with oak trees that serves the residents of the area. Also adjacent to the proposed casino resort is Old Redwood Highway which connects the small community of Larkfield to the town of Windsor. We expect increased traffic as the communities grow naturally but a casino resort will accelerate natural traffic issues beyond acceptability. My personal experience with multiple wildfire evacuations in the area are cause for great concern.

Thank you for considering my comments.

Michael Cote
mike.cote@sbcglobal.net

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From: jselby@sonic.net
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Sunday, June 19, 2022 6:20:25 PM

EXTERNAL

We are writing to express our deep concern regarding the proposed **Koi Nation Shiloh Resort and Casino Project**. This project is a terrible idea, on so many levels.

We have lived in Windsor for 42 years. We've watched it grow from a farm working community to a vibrant family-centered town. We have seen our share of 'growing pains' but this Casino would forever change the quality of life here in a way that would benefit no one except the project stakeholders. Following are some of our concerns:

Shiloh Rd is an extremely busy road.

Taking the Shiloh Rd exit traveling **west** from Hwy 101 to Windsor Rd: This is the road that folks take to get to WorldMark Resort, The Windsor Golf Course and Restaurant, the Santa Rosa Memorial Park Cemetery, Windsor High School, Cali Calmecac Language Academy, and two large subdivisions (Ventana and the Vintage Greens subdivisions). In addition, there is a large senior-living complex proposed at the corner of Shiloh Rd. and Hembree Ln. The proposal includes shops, restaurants and office buildings.

Taking the Shiloh Rd exit traveling **east** from Hwy 101: This is the road that leads to the large Shiloh Shopping Center, our beautiful Shiloh Ranch Regional Park and, very soon, will lead to a sizable housing complex on the NW corner of Shiloh and Old Redwood Hwy.

On Old Redwood Hwy, just a short distance **south** from Shiloh Rd., there are at least 3 churches. A short distance **north** is our local Esposti Park where families meet for picnics and sports games. It is a well-used and much-loved park. Less than a mile up the road is a senior retirement community.

Traffic going either direction is already a challenge at certain times of the day. Our roads are barely adequate. Please just imagine what impact the Resort and Casino will have on traffic flow in our community.

We are in a drought situation, with everyone working hard to comply with the Mandatory Water Rationing. We are also on hyper-alert for wildfires. Adding this proposed Resort and Casino increases the risk in both of these areas. Emergency Response times would most certainly be impacted.

We are in the midst of one of the most serious housing and homelessness crises this county and this town has faced. The massive amount of personnel it will take to operate this proposed casino will further exacerbate the situation. These employees will need to live *somewhere*. Low supply and high demand has already pushed housing costs past what most working people can afford, whether they are buying or renting.

Please understand, while we do not go to casinos, we are not opposed to them. We

are just deeply, fearfully, fervently opposed to ANY project of the size and scope of the proposed Shiloh Resort and Casino in this location, a project that would daily bring thousands of people to our community. Our infrastructure simply can't handle it.

Thank you for the opportunity to voice our concerns.

Sincerely,

James and Linda Selby
399 Jensen Lane
Windsor CA 95492
(707) 484-1766
jsselby@sonic.net

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From: [Dinah Costello](#)
To: [TribalAffairs](#)
Cc: [Dinah Costello](#)
Subject: Koi Nation Shiloh Road Casino Resort Proposal
Date: Sunday, June 19, 2022 1:04:10 PM

EXTERNAL

Tribal Affairs
Sonoma County, CA

To Whom It May Concern:

You will no doubt be receiving letters/emails from many in the Sonoma County, CA community opposing the Shiloh Casino Resort proposal of the Koi Nation of Lake (not Sonoma) County. The objections to this massive and uninvited intrusion into our neighborhood are numerous and, most importantly, well founded. They include the Koi Nations non-existent status in Sonoma County, the outside gaming interests using them as cover for another casino project, and countless environmental and public safety issues.

On a personal note: My wife and I, both teachers, moved to Windsor (Sonoma County) off Shiloh Road 20 years ago. We purchased our dream home -- surrounded by vineyards and 2 public parks (Shiloh Regional and Esposti) -- in a mostly agriculturally-zoned setting. We worked hard, paid our taxes, saved, and looked forward to spending our latter years here. We were shocked and dismayed to hear that a gigantic casino resort was being planned directly across the street from our home.

Sonoma County presently has a casino 15 minutes to the south (Graton) and 15 minutes to the north (River Rock) of our home. Building another casino in the middle of our neighborhood, destroying a beautiful vineyard and severely affecting the quality of life of our community, should have been stopped before it reached this stage. Please visit this beautiful area of Sonoma County. Drive down our block and imagine the damage this project will do to our neighbors and surrounding small businesses, schools, and churches. This whole project has caused unnecessary stress and anxiety in the good people we call our friends. Please join us and stop this ill-conceived and dangerous proposal from becoming reality.

Respectfully yours,

James Costello
5840 Mathilde Drive
Windsor, Ca 95492

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From: [Rachel Mercedes Verdugo](#)
To: [TribalAffairs](#)
Date: Sunday, June 19, 2022 12:23:34 AM

EXTERNAL

PLEASE ,""""WE DON'T WANT A CASINO """. THANK YOU.

Rachel Mercedes Verdugo

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From: rcdccmy@aol.com
To: [TribalAffairs](#)
Subject: No Koi Nation Casino
Date: Sunday, June 19, 2022 6:34:50 PM

EXTERNAL

Dear Sonoma County Representative,

I am writing to express my vehement opposition to the proposed casino on Shilo Road.

As a homeowner near this property, I have many many concerns regarding a casino on this site.

Over the past 5 years, we have had to evacuate this area 3 times (2 mandatory and one voluntary) due to fire danger.

It absolutely does not make sense to add a large casino and hotel in this location for the public fire safety issue alone.

Another critical issue is the lack of water. Currently we are in water saving measures. This means only being allowed to water on designated days and for limited times.

We are also using buckets to capture water while waiting for the shower to heat up. We then use that water to water the plants. Our multi year drought conditions can not support this proposed project!!

In addition, it is not in good conscience to build a gambling facility right across the street from a residential area, church, park and near an elementary school.

Please take the above concerns into consideration and let's stop the progress of this casino.

Thank You,
Ron & Carrie Myers

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From: [mzanette](#)
To: [TribalAffairs](#)
Subject: Oppose Casino Project
Date: Sunday, June 19, 2022 7:36:59 PM

EXTERNAL

I oppose this casino development due to the following reasons:

- Wildfire Risk
- Proximity to Residential Neighborhood, Churches, Schools
- Infrastructure Roads
- Loss of Open Space/Greenbelt
- Negative Ecological Impact
- Noise
- Drought/Water Availability/Mandatory Water Rationing
- Impact of Ignoring Zoning Restrictions
- Public Safety
- Quality of Neighborhood Activities
- No Significant Connection to the land by the Koi Tribe
- Emergency Response Time
- Greenhouse Gases
- Decline in Property Values

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From: [Arthur Walker](#)
To: [TribalAffairs](#)
Subject: Opposition and environmental concerns to Shiloh Casino
Date: Sunday, June 19, 2022 4:51:40 PM

EXTERNAL

We are Opposed because of the issues generated by the following concerns.

Infrastructure Roads
Loss of Open Space/Greenbelt
Negative Ecological Impact
Noise
Drought/Water Availability/Mandatory Water Rationing
Public Safety
Quality of Neighborhood Activities
No Significant Connection to the land by the Koi Tribe
Greenhouse Gases
Decline in Property Values

Sincerely,
Arthur and Marilyn Walker
5283 Arnica Way
Santa Rosa, California 95403

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From: [Dawn Johnson](#)
To: [TribalAffairs](#)
Subject: Proposed Casino on East Shilo Road
Date: Sunday, June 19, 2022 4:30:27 PM

EXTERNAL

Sonoma County Board of Supervisors,

The Town of Windsor has been my home for almost 24 years. As a resident of the south east corner of Windsor, I strongly oppose the proposed casino development for the following reasons:

- 1) Windsor's elected officials have created and implemented a town vision that is family oriented, and health and recreationally focused. Developing a casino resort next to a busy neighborhood park, a much loved Regional Park, established neighborhoods, and an active church community, goes against everything valued by residents.
- 2) Windsor is the host to a variety of bike and running events which often utilize the country roads surrounding this parcel of land. Local recreational cyclists and joggers also use these roads daily. The increased traffic this proposed development may bring puts riders and runners at an increased risk.
- 3) The south east corner of Windsor is highly impacted by an outdated two lane road (Old Redwood Highway) that cannot handle the current load of traffic, especially at commute times. During recent construction, new apartment complexes have been built abutting the street leaving no room to widen this road to accommodate traffic. The same issues are true of Shilo Road. The increased traffic from the proposed casino/resort would increase an already unacceptable situation, and would put more lives in jeopardy if residents had to, once again, evacuate for fires.
- 4) It is my understanding that established local tribes also oppose the casino/resort proposed by the Koi Tribe. No one wants this casino/resort!

Sincerely,

Dawn Johnson - Huff
707.837.9441

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From: [Sue Madura](#)
To: [TribalAffairs](#)
Subject: Proposed casino on East Shiloh Road
Date: Sunday, June 19, 2022 8:45:27 PM

EXTERNAL

Dear Members

I feel compelled to express my deep opposition to the Koi Tribe building a casino on the proposed site at East Shiloh Road. This area sits opposite Esposti Park, Oak Park residential subdivision and a variety of privately owned residences. Please consider the following reasons for denying a casino to be built there.

We are experiencing yet another period of extreme drought. Climate change and water shortages are very real and will be ongoing. Our precious water resources are to be conserved, not sold to the highest bidder. Local water tables are being depleted and a casino will have an extreme need for water.

My concern is also for the current and future residents of our area, which is known for its bicycle-friendly attitude and accommodations. Increased traffic on East Shiloh Road increases the likelihood of bicycle accidents, both for adults and children. Also, the proposed area is only 1.4 miles from San Miguel Elementary School at 5350 Faught Road. It is likely that casino patrons wanting to avoid traffic will use Faught Road as another exit, which will bring them right through another residential area and in front of the school.

One of many concerns to residents of this area is evacuation due to wildfires. During the last 5 years we have twice evacuated our homes. It was difficult to quickly and safely leave this area due to the amount of people on the road. Adding into the mix additional vehicles, and drivers unfamiliar with our area will only exacerbate our problems, making a safe exit more difficult.

East Shiloh Road, east of Old Redwood Highway, is primarily a residential and agricultural area with Esposti Park, an adjoining recreational area for kids and adults. Increased traffic will impact the safety of those who use the park. Also, the presence of a casino will have a negative effect upon property values, not only in Oak Park but also other surrounding neighborhoods.

I have seen many tribal casinos in Northern California, none built in a residential neighborhood. As we have seen in other areas, a casino brings increased traffic, noise and light pollution, and the potential for more crime.

Please understand that my opposition is not to casinos, but rather to the location chosen by the tribe. The area in question is not zoned or appropriate for a casino with all of its inherent issues. My hope is that the Koi Tribe will respect the concerns expressed and look for land in a more appropriate, non-residential/non-agricultural area.

Respectfully,

Susan D. Madura

411 Firelight Drive

Santa Rosa, CA 95403

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From: [Nancy Jenkins](#)
To: chad.broussard@bia.gov; [TribalAffairs](#)
Cc: Senator.mcguire@senate.ca.gov; towncouncil@townofwindsor.com
Subject: Proposed Koi Casino on E Shiloh Rd
Date: Sunday, June 19, 2022 7:02:53 PM
Attachments: [Proposed Koi Casino letter of opposition.docx](#)

EXTERNAL

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From: [Marie Fanelli](#)
To: [TribalAffairs](#)
Subject: Shilo Road development
Date: Sunday, June 19, 2022 4:59:17 PM

EXTERNAL

Thank you in advance for considering my opinion and my family's negative opinion of the potential for ANY commercial development at the Shilo intersection. Our community struggles now balancing infrastructure needs and the residential development that's required in our available spaces open to develop. My family and I reside on the East side of Windsor along Hembree Lane. We lived through our existing neighborhoods needing to be evacuated and I find it unconscionable to consider that our community be asked to allow a development that would create a perfect bottleneck disaster. The new dense residential projects planned and currently being built will tax already strained surface roads. We undertake these projects considering the community's housing NEEDS during a housing crisis. I'm sure somebody there in the emergency services department could calculate of the duration of the vehicle back-up along ORH and Hembree Lane during the last evacuation. That was a planned, orderly evacuation that took hours. An emergency evacuation of this area would not be possible with the intended development of the casino and its adjacent supporting businesses intended by the tribe that we DO NOT NEED. Additionally, we are just now getting our act together to hopefully survive as the drought gets worse and less water is available. Please, do the right thing and prevent this from happening. It is the wrong project at the wrong time for that location.

Sincerely,
Marie Fanelli
611 Yerba Buena Way
Windsor CA

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From: [TERESA LOPEZ](#)
To: [TribalAffairs](#); [district4](#)
Subject: Shiloh Rd proposed Casino
Date: Sunday, June 19, 2022 10:21:22 AM

EXTERNAL

To Whom It May Concern:

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 30+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, our streets and freeways will be most seriously impacted - again NOT in a positive manner, including more crime, increased public safety expenses, etc. When we all evacuated three years ago, the roads were clogged and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose the building of this casino.

Thank you,

Mary Lopez
Santa Rosa 95403

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From: [Mary Euphrat](#)
To: [TribalAffairs](#)
Subject: Koi Casino - Shiloh Resort
Date: Monday, June 27, 2022 8:04:52 AM

EXTERNAL

County of Sonoma

I do hope that part of your consideration of this poorly conceived project includes the impact of the project on adjoining residential neighborhoods and playgrounds. The proposed project area of Shiloh Road has inadequate traffic patterns for such a large scale project. The project will largely use the Shiloh Road exit off Highway 101. That exit, which is the main access to the western portion of Windsor, main access to a local regional park, and main access to large shopping center, is one lane. This one lane is adequate for current use, but the addition of this massive project alongside existing residences and on the very tight road to one of our regional parks is a traffic nightmare for the future. Putting aside my objections to the casino itself, any large scale entertainment proposal for this site is unworkable. We would have the same problem with a theme park or Six Flags. This site is residential/agricultural in nature, currently used for vineyards. I ask you to give careful consideration to the enormous negative impact on the Town of Windsor and its residents. I support the need for actual local tribes to seek casino licenses, and we have two casinos within a 20 minute drive of this location. But neither of the casinos are in residential neighborhoods. Also, the KOI are not a Sonoma County tribe. They should not be permitted to encroach into another tribe's sovereign territory. Lastly, this was a clever but disingenuous purchase by the KOI. They kept it silent, so as to avoid local uproar, and they made sure that the project would lie adjacent to, but beyond the town limits of Windsor. However, do not be misled that this "county land" is somewhere far afield from our playgrounds and neighborhoods. To the contrary it is right in the middle of an active corridor for Windsor residents and visitors to our regional park. Furthermore, we are in a drought. We are trying hard to conserve this precious resource. These types of development are awful for our climate change influenced environment, and will destroy the agricultural feel and scenic beauty of our small part of Sonoma County. Please reject this proposal. I would also like to mention that I am concerned about the Mobile Home Park adjacent to Pruitt Creek. They already have issues from flooding. If this project goes through then they will most likely flood at a larger capacity and these are people that are low income and elderly. It is not fair to them. Greed should not succeed.

Sincerely,

Mary Euphrat

--

Mary Euphrat

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From: [BEN TENHAVE](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Monday, June 27, 2022 8:05:00 AM

EXTERNAL

I am writing this email over my concerns of the proposed Casino located at the intersection of Old Redwood Hwy and Shilo Rd. on Windsor. Listed below are just a few on my major concerns.

Misleading information regarding the location of the project. The photos in the news paper showing the proposed location shows blank spaces to the north side of Shilo Rd. They do not show the neighborhoods or kids baseball fields that have been there for over 20m years.

We are in a major drought and they want to build a Casino and 400 room Hotel? Where is the water coming from?

Wildfire and Emergency Response time and access. Over the past several years I can recall at least two Wildfires that have reached Shilo Park which is located just east of the proposed location. Even with improvements to Shilo Rd. and Faught Rd. access and exit routes would be limited.

I hope you will take into consideration our community concerns and do everything in your power to stop this Project.

Thank You, Ben TenHave

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From: [HEIDI JACQUIN](#)
To: [TribalAffairs](#)
Subject: Shiloh casino
Date: Monday, June 27, 2022 8:05:04 AM

EXTERNAL

To Whom it May Concern,

I am strongly apposed to a casino in our residential neighborhood.

The negative impacts that are easily foreseeable are:

Traffic issues during wildfire, the inability for residents to evacuate with substantial casino traffic blocking access routes

Water issues...our area is already stressed by extreme drought and we don't need more water use that would come with a casino and hotel operating 24/7

Crime that follows casinos. We have a very nice residential area that is currently low crime. The casino money brings crime along with it

Lower property values. Residences around casinos plummet in value.

Loss of natural habitat. The land has been used for agriculture and many animals make their home there. This will be an environmental travesty.

This is not a good place for a casino. Perhaps the casino could be built in Lake County where the tribe has historically resided.

Sincerely,

Heidi Jacquin

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June 19, 2022

Sonoma County Representatives

Shiho Road Casino

Page 1 of 2

I have been a resident of Sonoma County since 1986 and I am proud and happy that I made the decision to relocate here, I live in the Larkfield Wikiup area, and it has been a great area for my family of three children to grow up and move on with their lives.

I moved to this area from Las Vegas after a commitment of 5 years with my employer. I saw cases of how bad the casino's had on my employees and families who lost all of their money in one night and ruined their families.

Casino's do bring jobs and revenue to an area but to build such a large project in the area of Shiloh Road is not acceptable to me or the residents of my neighborhood. There is a great local park across the street from this project that provides sports activities of the local community, and this would be a disruption to their safety and of the quietness and the safety of traffic on Shiloh and Old Redwood Highway.

The casino would bring a large flow of traffic, bringing with it the pollution of the cars and the noise and the draining of our water resources in our area.

We have experienced two major fire evacuations in this area and with few roads to get out of the area quickly. There was traffic backed up for miles with families trying to escape the raging fire that destroyed almost 6,000 homes and destroying the years of memories with families that can never be replaced.

With the effects of climate change and the sever drought that we are experiencing, the water table is being lowered to families in our area, Wells are drying up and water has to be trucked to properties for the survival of common drinking water and sanitation. This project would future drain our

valuable and limited water supply. There is no local water distribution to the area so wells would have to be drilled to support this project. The fire requirements per NFPA 1142 could exceed 500,000 to over a million gallons of water storage for fire and domestic use. The buildings should be required to have fire sprinkler and the property with fire hydrants. Diesel fire pump would be required to provide the necessary pressure and gallons of fire protection. Per NFPA 25, a diesel fire pump is required to be exercised, run, 30 minutes weekly. This will add to the noise and air pollution in our area.

Just the daily water requirement of a casino, hotel / resort with pools, rooms, restaurants, beverages, ice, sanitation, ect would be a tremendous drain on our already limited water supply. The wastewater would require a new wastewater treatment plant on site and that would add noise, consume energy, and emit.

This project would be a huge disruption to our very rural and beautiful area.

This new casino / resort will cause a drop property values to our great Larkfield Wikiup area and the surrounding area. Who would want to live by a noisy, high traffic, crime attracting, business like the casino? The lights alone at night will disrupt our beautiful night sky for seeing the stars.

There are open areas away from the populated public to build such a project, so why destroy our beautiful area? This would be a constant, 24 hour disruption to a beautiful, calm, limited access, limited water, area. This is not the intended use of this land for our area.

There has been no one in our area that I have discussed this with that approve of such a project to be constructed. This is the wrong area for such a large and the type of project and would be a disruption to the environment. Please do not allow this project to go forward.

Respectfully,

Tim Madura

411 Firelight Drive

Santa Rosa, California 95403

From: [altkleber](#)
To: [TribalAffairs](#)
Subject: Casino in Windsor
Date: Monday, June 20, 2022 7:21:15 PM

EXTERNAL

Hello,

The proposed Windsor casino resort would not be good for Sonoma County and those who work and/or live in the county. Numerous points regarding the inappropriateness can be made but three particular points are:

#1. Location

The land bordered by Faught Road, East Shiloh and Old Redwood Hwy, which is adjacent to a well established neighborhood and much used county park, is a highly inappropriate location for a casino resort. The immediate as well as surrounding areas would lose their unique rural charm; rather, the fertile ground of the existing vineyard would be covered by concrete, lights would add to night pollution, increased vehicles would further crowd overburdened roads ... The Graton Casino is located in a business area that is easily accessed by the freeway and surface streets. River Rock Casino, which is in a precarious location on a steep hillside in a prime wildfire area, was built on the existing Rancheria of the Dry Creek Band of the Pomo Indians.

#2. Water

Water is a much valued and contested resource in Sonoma County; the need or use of water by residents versus agriculture is an ongoing debate, particularly in the third year of a drought. An additional casino resort will unnecessarily further deplete the limited water reserves.

#3. Fire

The proposed casino resort borders or may be directly in an area that is of high risk for fire. As someone who lives in the Larkfield/ Mark West area, I assure you that when, not if, another fire occurs, an evacuation will again be difficult. The population in the area has only increased since 2017; although there have been improvements regarding the tracking of fires and notifying residents of risk/danger, significant work still needs to be done regarding wildfire preparedness. If built, the casino resort will not be fireproof. Rather, guests and employees will anxiously crowd the roads in addition to residents and, depending on the hour, customers, employees, business owners, and park visitors. The potential for mayhem is ridiculously high.

Please do not approve the building of the proposed Windsor casino resort.

Thank you,

Lura Tibbits-Kleber

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From: [paula.haskins](#)
To: [TribalAffairs](#)
Subject: casino on east shiloh santa rosa
Date: Monday, June 20, 2022 12:57:59 PM

EXTERNAL

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From: [John Bocci](#)
To: [TribalAffairs](#)
Subject: Casino
Date: Monday, June 20, 2022 12:59:03 PM

EXTERNAL

Hi my name is John Bocci. I am the owner and manager at Mobile Home Estate- I represent approximately 200 residents at the mobile home park at 5761 Old Redwood Hwy that oppose the construction of a casino on Shiloh road directly across Old Redwood Hwy from this senior residential community.

For many reasons this is a bad and unsafe location for a casino.

1. Proximity to residential homes and parks.
2. Fire safety in an area that has been previously impacted, and that relies on the fire break that the current vineyard provides.
3. Water- Mobile Home Estates provides water to its residents through a well that is impacted by the draught. The demand of a large casino and its water needs seriously impacts the ability to provide the residents of Mobile Home Estates an adequate and safe water supply.
4. Noise, traffic and crime which may come from a large public gathering place is not appropriate or safe so close to people's homes. As we are serviced by Sonoma County Sheriff and not Windsor or Santa Rosa police - this seems to put a burden on current staffing of the sheriff's department which seems to already have an excessive workload.

Please consider the residents of Mobile Home Estates and the many neighbors in such close proximity to the proposed casino. Please oppose the construction of a casino at this particular location.

I understand a project such as this is always going to meet with opposition, but this is truly an example where the location is particularly unsuited for a casino and there are surely other options that would better suit the casino's location needs.

Sincerely,

John Bocci and the residents of Mobile Home Estates
Sent from my iPhone

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From: [DINAH COSTELLO](#)
To: [TribalAffairs](#)
Subject: Comments on the proposed Koi Nation Shiloh Resort and Casino Project
Date: Monday, June 20, 2022 8:08:38 AM

EXTERNAL

To Whom it May Concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Issues:

- **Wildfire Risk**
- **Proximity to Residential Neighborhood, Churches, Schools**
- **Infrastructure Roads**
- **Loss of Open Space/Greenbelt**
- **Negative Ecological Impact**
- **Noise**
- **Drought/Water Availability/Mandatory Water Rationing**
- **Impact of Ignoring Zoning Restrictions**
- **Public Safety**
- **Quality of Neighborhood Activities**
- **No Significant Connection to the land by the Koi Tribe**
- **Emergency Response Time**
- **Greenhouse Gases**

Sincerely
Dinah Costello
5840 Mathilde Drive
Windsor, CA
95492

Sent from my iPad

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From: [Tim Swift](#)
To: [TribalAffairs](#)
Subject: Concern for house and home pollution impact
Date: Monday, June 20, 2022 3:47:17 PM

EXTERNAL

Dear Sirs,

My name is Tim Swift I live at 432 Tamara way, Windsor Ca. The proposed Indian Casino is very close to our residential neighborhood. This will negatively impact me and my family health by:

Increased Noise pollution and car pollution. Increased crime down our street since we are the backdoor to major shopping. Light pollution, this use to be a country piece of property if you allow a constantly lite-up structure I will not be able to see the stars at night. Traffic issues, pulling out of Tamara way is already dangerous with the blind curve to the left. If you double the amount of cars, especially at night with increased drunken drivers on Old Redwood Hwy coming from the Casino it will very dangerous to take a left out of Tamara way, Windsor.

This Casino will change the complete demographic of the area it will be less fit to raise a family in our family home.

Please don't let this uniproperiate facility be built this close to our family home.

Respectfully yours.

Tim Swift
432 Tamara way
Windsor, CA 95492

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From: [BeeHappy](#)
To: [TribalAffairs](#)
Cc: [SkinVoyage](#)
Subject: Jennifer Coleman: strong opposition Windsor Shiloh Indian casino
Date: Monday, June 20, 2022 9:24:40 AM

EXTERNAL

Hello Sonoma County Board Of Supervisors,

My name is Jennifer Coleman. As a resident of Sonoma County I vehemently oppose the location of the Indian casino building site in Windsor at the corner of Shiloh Road and Old Redwood Highway intersection, City of Windsor. This, for the reasons below .

Some Examples of Issues:

- **Wildfire Risk**
- **Proximity to Residential Neighborhood, Churches, Schools**
- **Infrastructure Roads**
- **Loss of Open Space/Greenbelt**
- **Negative Ecological Impact**
- **Noise**
- **Drought/Water Availability/Mandatory Water Rationing**
- **Impact of Ignoring Zoning Restrictions**
- **Public Safety**
- **Quality of Neighborhood Activities**
- **No Significant Connection to the land by the Koi Tribe**
- **Emergency Response Time**
- **Greenhouse Gases**
- **Decline in Property Values**

Sincerely,

Jennifer Coleman

Sent from my iPhone

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From: [Kathy Hansen](#)
To: [TribalAffairs](#)
Cc: [Kathy Hansen](#)
Subject: Koi nation proposed casino
Date: Monday, June 20, 2022 8:29:01 AM

EXTERNAL

We are writing in opposition to the proposed Koi nation casino/resort on Shiloh Road north of Santa Rosa. We are the original owners of our home in the Wikiup area having purchased our house in May, 1987. We have seen our area build up with many new homes, a regional park and the Mayacama resort. Although these have added to the population and the traffic, they were done keeping with the agricultural climate of our area.

We also, unfortunately, have been under two mandatory evacuations due to devastating fires that burned within 1/2 of our home.

A casino/resort is not an appropriate addition to our neighborhood!

There are two large casinos already in the area (River Rock to the north and Graton to the south). There are also two elementary schools (San Miguel only 1 mile to the south of the proposed casino and Mattie Washburn only two mile to the north), a county regional park at the end of Shiloh Road and a youth field directly across the street. The proposed casino is surrounded by facilities used by children and their families. A casino does not belong in the middle of these!

There is also the ever-present concern regarding traffic, but especially regarding safe exits in the case of emergencies.

We respectfully request that this proposed casino/resort be denied.

Thank you,

Rick and Kathy Hansen

530 Coachlight Place

Santa Rosa, CA 95403

(707) 217-0204

Sent from my iPad

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From: [Pat Warren](#)
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort & Casino .
Date: Monday, June 20, 2022 9:45:39 PM

EXTERNAL

Tribal Affairs Official

I oppose the building of the Koi Nation Shiloh Resort & Casino Project. Below are my concerns on the project.

1. The Koi Tribe has No significant connection to the land they have purchase on Shiloh Road in Sonoma County CA .
2. Wildfire risk would be increased. To many people to evacuate safely along with local residents on Shiloh Road to Highway 101. One way out.
3. Proximity to residential neighborhoods... way to close.
4. Local churches provide food banks, daycare and other activities to the surrounding communities. Traffic would be a major problem.
5. Windsor schools provide bus service on Shiloh Road, Faught Road and Pleasant Avenue as well as all Larkfield school bussing.
6. Road Infrastructure - Shiloh Road, Faught Road, Old Redwood Highway are all in need of major repairs. Pruitt Creek bridge to small and old for multiple busses, cars and bikes.
7. Loss of open space/greenbelt would affect everyone in proximity of the casino.
8. Negative ecological impact to Shiloh County Park and wildlife migrations as well as fish and pond turtles in Pruitt Creek.
9. Greenhouse gases.
10. Drought/water availability/mandatory water rationing occurring frequently in Sonoma County.
11. Impact of ignoring zoning restrictions which occurs during any construction.
12. Rodgers Creek Earthquake fault line runs along Shiloh Ridge above proposed property of the casino.
13. Quality of life for neighborhood activities will be reduced significantly.
14. Emergency response time delayed.
15. New fire station needed as well as ambulances and other first responders.
16. Decline of property values would effect all residents on the East side of Windsor and Larkfield.

Please consider these concerns. I have lived in the neighborhood of Oak Creek off Old Redwood Highway and Shiloh for 47 years and love the quiet agricultural surroundings. The casino would shatter the serenity and safety of our area.

Pat Warren
patdjw7@comcast.net
6181 Lockwood Drive
Windsor, CA 95492

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From: [RICHARD BOYD](#)
To: [TribalAffairs](#)
Subject: my letter to the BIA in Sacramento
Date: Monday, June 20, 2022 7:21:52 PM

EXTERNAL

Richard N. Boyd
5846 Leona Court
Windsor, CA 95492
June 18, 2022

Ms. Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: Koi Nation Shiloh Resort and Casino Project

Dear Ms. Dutschke,

I am writing to express my concerns about the proposed Koi Nation Casino just adjacent to Windsor, CA. I am a homeowner two blocks from Shiloh Road, and was horrified when I first heard about the proposed project. My reasons are numerous and will be detailed below. For the record, I generally support the efforts of Indians to establish themselves; I am an honorary Native American (Santa Clara Pueblo), so my beliefs in that regard are well documented.

But let me provide more details.

How would the citizens of the Koi Nation benefit from this? This is one of my major concerns. Since the Koi are partnering with the (much larger) Chickasaw Nation, currently based in Oklahoma, and the casino as proposed would have thousands of employees, the Chickasaw Nation would clearly dominate the operation of the project. Given this situation it's difficult to see how the Koi Nation would profit more than incrementally from it.

How would the casino affect water resources and runoff? The proposal states that water for the casino would come from wells. But extracting huge amounts of water from the local aquifer will surely affect water levels everywhere. It is not difficult to imagine that the amount of water required to operate the proposed hotel and casino would cause many nearby wells to run dry. Please investigate this concern very carefully.

As for runoff, that's another major issue. Replacing a large fraction of what is now farmland, which soaks up much of the runoff in any rainfall, with buildings and asphalt

will certainly have an impact on the water that will be dumped into Pruitt Creek, especially in case of a heavy rainfall. And extreme effects like that are the way of the future. I am concerned that Pruitt Creek would become a raging river if it needs to handle a greatly increased runoff load from a heavy rainfall.

How would the casino affect air quality? Even after construction was completed, the huge amount of traffic in the area from the thousands of vehicles anticipated on Old Redwood Highway and Shiloh Road would undoubtedly have an extremely deleterious effect on the local air quality. Please study this possibility carefully.

Would the casino affect biological resources? The extent of these effects are not discernable from the proposal. It uses the phrase "To the extent feasible, the proposed project would avoid development within Pruitt Creek and associated riparian corridor." If the proposal goes forward, that gives carte blanche to the operators of the casino when its needs and wants are in conflict with what is "feasible." Please be sure this issue is better defined.

Would the project adversely affect Transportation and Circulation? Obviously yes. The huge increase in traffic on Shiloh Road and Old Redwood Highway would impact vehicular traffic, leading to congestion, tie-ups, and an increase in accidents (especially from somewhat inebriated customers of the casino). Users of Esposti Park: families, and children, especially little leaguers, will be at risk, as will people using Shiloh Park. Furthermore, the hundreds of new families who will inhabit the large new development at the northwest corner of Old Redwood Highway and Shiloh Road, together with the partisans of the casino, would inevitably cause a huge increase in traffic.

I believe the issue that merits your greatest attention is the effect of the huge number of people at the casino when the area needs to be evacuated due to fire danger. This has happened twice in the last four years, and with the changing climate, it can be expected to become even more frequent. Roads were already congested during those evacuations, and dumping ten thousand or more cars into the mix would be expected to produce an extremely dangerous situation.

How would the project affect land use? The proposal states that it would maintain existing vineyard areas around the site perimeter to reduce the potential for land use conflicts with adjacent residential and agricultural areas." This clearly needs greater specification,. How many rows of grapes would be maintained? One? Ten? And how could that have a positive effect anyway on "land use conflicts with adjacent residential areas" with a behemoth of a casino lurking right behind? Please give this question your serious attention.

How would the Project affect the need for public services from Windsor? The claim is that no public services would be needed. What happens when its wells run dry? And can the Project really process its waste water? Will there be settling ponds? Where? There is little in the proposal to suggest that the source of water and the processing of wastewater has been thought through. Especially when there is a serious drought.

How would the project affect the noise and aesthetics in the area? This is also an important question. Gambling casinos, complete with restaurants, bars, and slot machines, are not quiet places. Add to that thousands of cars coming and going per day, and the noise level would be expected to increase by a huge factor.

As for aesthetics, it's difficult to imagine anything having a more negative effect on what is currently a quiet residential neighborhood than an enormous twenty-four/seven gambling casino. Please give this question your most serious attention; if the project were to go forward it certainly has the potential to destroy the neighborhoods of the entire south side of Windsor.

Alternate sites or plans. I do not see reducing the scope of the project, even by quite a bit, as a realistic alternative to the current plan. I fear that a huge casino, with a hotel, restaurants, and parking lots would still be a dangerous development, compromising safety and environmental quality for the entire area.

I appreciate the attention you will be giving to these and the many other issues associated with the Koi Nation Shiloh Resort Casino Project proposal.

Yours sincerely,

Richard N. Boyd, Ph.D.

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From: [Anya Piazza-Lyons](#)
To: [TribalAffairs](#)
Subject: No Casino
Date: Monday, June 20, 2022 11:45:35 AM

EXTERNAL

People live in that vicinity.

Our population does not need anymore gambling. There are plenty of opportunities for people to gamble in our area and the more opportunities that we give them the more we will have addiction.

This can not happen!

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From: [Dirk Bietau](#)
To: [TribalAffairs](#)
Subject: Opposing Casino in Windsor
Date: Monday, June 20, 2022 8:51:17 AM

EXTERNAL

Hello,

I have been a resident in Windsor for over 15 years and I am strongly opposing yet another casino in Sonoma County.

My biggest concerns are the environmental impact that a casino will have and the loss of the beautiful open space as well as what will happen to our neighborhood. Noise and light pollution will increase greatly without a doubt as well.

I live about 1/2 mile from the proposed site and this will most definitely have an impact on the property values in and

around our neighborhoods. There will also be an increase in crime and additional traffic. We are already in a drought,

and the increase of water use at this new massive building with all its hotel rooms will be massive.

I AM AGAINST THE PROPOSED NEW CASINO IN WINDSOR!!!

Dirk Bietau

(resident of Windsor)

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From: [betsy.mallace](#)
To: [TribalAffairs](#)
Subject: opposition to Koi BIA Fee-to-trust land application
Date: Monday, June 20, 2022 3:20:00 PM

EXTERNAL

Hi,

I am writing to add my opposition to the Koi Nation (of Lake County) application for Fee-to-Trust. Please ensure that the BIA scoping report include all fire risks that approving this application would create or worsen. Vineyard have acted as natural fire breaks in the last 2 fires, converting a current vineyard into a large commercial project would not only remove the natural fire break, but add additional fire risks. There is not currently enough emergency evacuation routes leading out of Shiloh Ridge and the surrounding areas, adding a large commercial project would only make this area more dangerous and less safe. Please add my thoughts to the counties list of details to be added to the scoping process.

Many thanks for representing a resident and voter of Sonoma County.

Betsy Mallace
Windsor, CA

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From: [Jeff Bertoli](#)
To: [TribalAffairs](#)
Subject: Opposition to Koi Nation Casino
Date: Monday, June 20, 2022 7:03:55 PM

EXTERNAL

To whom it may concern.....

The desire of the Koi Nation to establish a casino on East Shiloh road positioned right across the street from long established residences and neighborhoods, near churches and schools, in the middle of some of the most pristine agricultural areas in Sonoma County, causing a decline of all of the nearby property values is one of the most incredibly insensitive, disrespectful and appalling actions any tribe could make. I am appalled. Add to all of this, the tribe has no connection, of any significance, to the area!! What am I missing? How could this be viable simply on that point?

I have been simply stunned since it was announced and I have been in violent disagreement since its disclosure. There is no legitimate justification, at least from where I sit, to grant the approval of this site. None!! This must be denied and the tribe should be required to go find a parcel that creates no impact to surrounding neighborhoods, agricultural land and the overall well being of Sonoma County. AND it should be from within the region that the tribe originated and is historically associated with.

Yours in complete disgust.....

Jeff Bertoli
5th generation Santa Rosa Native

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From: [Paige Mazzone](#)
To: [TribalAffairs](#)
Subject: Opposition to Proposed Casino off of Shiloh Road
Date: Monday, June 20, 2022 3:22:48 PM

EXTERNAL

I am writing to voice our strong opposition to the proposed casino off of Shiloh Road. As you are no doubt aware, the Koi Tribe from Lake County has recently purchased vineyard acreage adjacent to a series of single-family residential neighborhoods, located at the crossroads of Old Redwood Highway and East Shiloh in North Santa Rosa/Windsor. They have announced plans to build a large casino complex, including multiple restaurants and a 200-room hotel. Our neighborhood, and all neighborhoods in the surrounding area, are very distressed by this plan and ask for your support in stopping this development. While we understand the need to address the wrongs committed against indigenous people in our country, we are confident that this proposed development is not an appropriate manifestation of those efforts. There are several reasons for our lack of support:

- It is well documented that the Koi tribe comes from Lake County. That is their tribal heritage and land. They did have a trade route through Sonoma County. All history and knowledge of this trade route shows that the path followed the Russian River and did not pass through the Windsor area. That was not the direct path followed. There should be no claim to this land as tribal land for a tribe from Lake County, either inherently or via a trade route. Rather, the land is prime real estate that is attractive. That does not justify tribal trust land jurisdiction.
- The neighborhoods adjacent to this proposed casino are middle class, mostly long-time resident neighborhoods. We are families, retired couples and citizens that have invested in our properties for a lifetime, planning to retire in the area because it is quiet, safe and family oriented. To introduce a casino in the midst of these neighborhoods would immediately and irreparably damage both the quality of the residents' lives as well as their lifetime investments.
- It is well established that casinos cause an increase in prostitution, drunk driving and crime in the immediate area. In the Thompson, Gazel and Rickman study of 1996, the researchers found that, "that the casino or near casino counties had rates of major crimes 6.7% higher than expected and Part II offense arrest rates were 12.2% higher than non-casino counties. They concluded that the **introduction of casino gambling is associated with increased crime.**" (Thompson, Gazel, & Rickman, 1996). This increase in crime will not be isolated in a remote area, focused on the casino. It will spread into multiple nearby residential neighborhoods.
- In addition, there are several elementary schools and two high schools within a 7-mile area of the proposed casino. This increase in crime will play out in the lives of these youth and, without a doubt, be an enticement to them in terms of underage drinking and possible crime.
- Traffic in our area has already been increased due to the shopping center on Shiloh and the Sonoma County Airport area. Most days the commute to work involves a 20-minute journey from Old Redwood highway to the freeway access at Shiloh and 101. There is no other clear pass for an on ramp, since all potential pathways run directly through residential neighborhoods. There is no place for traffic to a casino and 200-room hotel to go but onto Shiloh and Old Redwood Highway. This will create incredible backups and traffic issues, increase accidents and clog the flow of movement for everyday life in the area.
- Our neighborhoods that directly adjoin the proposed casino property have all been evacuated consistently during fires in Sonoma County. The evacuations cause traffic. In the Tubbs fire, as you know, lack of planning for traffic in emergencies caused deaths due to people not being able to drive or get to safety fast enough. We are very concerned that a casino will exacerbate this issue in our area, causing horrific impacts that can be avoided.
- While we understand that tribal land developments are not held to CEQA standards, the

surrounding areas are. We have red tailed hawks, barn owls, fox, flowers, bobcats and many other forms of wildlife in our area. We see them frequently. There is no way that a development in that vineyard will not significantly damage the environmental surroundings and wildlife present.

- We already have infrastructure issues in our area. Cable lines are overloaded and have not been upgraded. Internet is not strong. To put the size of a development proposed, with the individual televisions, internet connections and technology needs required of a hotel and casino, would completely damage the ability of our neighborhoods to enjoy such needed activities as working from home or basic recreation such as watching a movie at home. In addition, we are in a drought and already limiting our water intake, plant care, etc at the request of the city and county. To put this large a facility in the middle of a fire zone affected by drought seems irresponsible and very inequitable to the local residents being asked to cut back.

For all these reasons, we feel this casino must be stopped. We are asking for your support in stopping this development. We are happy to discuss any further points with you. Thank you for your consideration.

Respectfully,

Paige Mazzoni and Brad Pighin

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From: [Jennifer Lopez](#)
To: [TribalAffairs](#)
Subject: OPPOSITION TO PROPOSED KOI CASINO SITE
Date: Monday, June 20, 2022 10:15:12 AM

EXTERNAL

County of Sonoma,

We strongly oppose the KOI casino project.

My husband, myself and our 8 year old daughter live within 3 minutes of the proposed KOI casino site. We have built our life and chosen to raise our family in Windsor. We've encouraged our parents and other family members to relocate to our small, safe and family friendly community.

The increased traffic in our neighborhood in addition to the tens of thousands of visitors (many with bad intentions) SO close to our home, are our main family concerns.

Additional MAJOR concerns for our community: lack of infrastructure, ecological impact, drought, fire evacuations, public safety, noise and proximity to school, churches and neighborhoods.

Jennifer and Jaime Lopez
Windsor, CA

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From: [Eric Chazankin](#)
To: [TribalAffairs](#)
Subject: Please reject Shiloh casino resort
Date: Monday, June 20, 2022 4:58:02 PM

EXTERNAL

Greetings. I write to express opposition to the proposed Koi Nation casino project on Shiloh Road in Sonoma County.

In addition to the numerous problems this would cause to the local community overall, this would harm me and my family, personally and directly. My family (I am trustee of our family trust) owns a house in Shiloh Estates, and I also have a house near the Windsor golf course. My parents owned the house in Shiloh for more than 25 years, before my father's unfortunate death in 2018. My father was a well-known and respected commercial real estate broker and member of the community, active with many organizations and a past president of the Shiloh Estates HOA. He was also a board member at 6th Street Playhouse, and a Vietnam-era veteran of the US Marine Corps. Before he died, I promised him I would take care of Mom, who lives at the Shiloh Estates house and is now over 80 with multiple health issues. To do that, I travel back and forth between these two properties many times per week - sometimes multiple times in a day. The only direct route between the two is on Shiloh Road directly past the proposed Koi casino. This project would make it much more difficult for me to fulfill my daily responsibilities to my family.

This project would snarl traffic, make access much more difficult and time consuming, compromise emergency access and public safety, completely alter the low-density residential character of the whole neighborhood, over-tax roads including highway 101, and strain water and wastewater systems.

I support Native American rights, having studied with some of the top experts in the field at the University of Colorado Law School. But this project is not the right location for this tribe to proceed with this size, scope and nature of development; its simply the wrong location for this project.

Thank you,

- Eric

Eric Chazankin, CEO / General Counsel
Bay Tree Properties
Santa Rosa, California
<echazan@sonic.net>
707-576-0777 office
707-575-6900 fax
707-292-4714 cell
Cal DRE Broker Lic. 01240499
Cal State Bar #197055
Colorado Supreme Court Reg. #21791

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From: [paula.haskins](#)
To: [TribalAffairs](#)
Subject: proposed casino at east shiloh in sonoma county
Date: Monday, June 20, 2022 1:46:47 PM

EXTERNAL

Hello, I live at Mobile Home Estates senior park, across the road from the proposed location. I strongly feel that this casino is not a good fit for this location. The idea of having 24 hour traffic with all the noise that includes, is not appropriate for a quiet community, not to mention the pollution that comes with having a casino in our midst. There is also the question of water. We have been in a drought for the past couple of years. Think of all the water this casino is going to use. I have already cut back on my showers, water my plants less often and flush the toilet less frequently. How much water are the casino people going to use? I doubt if they are going to cut back. In addition, we lose open natural land. Sonoma county needs green areas to combat the pollution we already have. Lastly, what happens if we have a fire? How are we all going to get out safely with so many cars blocking the roads? I Don't WANT A CASINO HERE. FIND ANOTHER BETTER SUITED LOCATION.

Respectfully
Paula M Haskins

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From: [Stevie Jean Lazo](#)
To: [TribalAffairs](#)
Subject: Proposed Casino at Old Redwood Highway and Shiloh Road - NO, NO, NO!!!
Date: Monday, June 20, 2022 6:11:55 PM

EXTERNAL

Absolutely NOT!! This is a terrible idea. Number one, we cannot sustain the development we already have. Our roads are already crumbling. Because of years upon years of drought water is at a critical low. We cannot support this operation!

This area is a beautiful neighborhood with family homes and vineyards. A casino would destroy all that we hold dear here in Sonoma County. Open spaces, vineyards, parks. This whole idea is an abomination!

And this tribe, the Koi Tribe, they have no significant connection here in Sonoma County. I wouldn't approve of any casino though no matter what tribe it was.

Gambling is a vice. We should not be promoting it any more.

Also, we live in a fire sensitive area. This casino will only exacerbate the issues our emergency services already have to deal with. It's a bad idea.

All in all, this is one of the most horrible ideas I have ever heard proposed since I moved to Santa Rosa. I pray to God it gets no traction and the entire project dies quickly.

Sincerely,
Stephanie Lazo
Larkfield, CA

Life is short, have a cookie!

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From: [Cliff / WC Wine Rsv](#)
To: [TribalAffairs](#)
Subject: Proposed Casino at Shiloh Road
Date: Monday, June 20, 2022 8:10:22 PM
Attachments: [image003.png](#)

EXTERNAL

Tribal Affairs,

I am writing with extreme opposition to the proposed casino resort at Shiloh Road in the Northern Santa Rosa/Windsor area. Since day one in hearing about this proposal I have been stressed about the effects this would have in not just my neighborhood, not just Santa Rosa/Windsor but also the greater Sonoma County area. The proposed location is a first a residential area and secondly and agricultural area. The massive operation of a casino resort would be extremely detrimental to all facets of life in the surrounding area: homes and families, parks for recreation and youth sports, schools, churches, infrastructure, etc.

I live at 237 Lea Street in Windsor. The proposed casino resort would be right out my back door and across Shiloh Road. The most disturbing issue to me, as a resident, is the ability to evacuate myself and my family when the next wildfire happens. We were evacuated in both 2017 and 2019. It was terrifying and in 2019 I was convinced from reports that our house was gone. Thankfully, the fire was stopped about a quarter mile from our house and only 100 yards from the houses on Lockwood Drive. Getting out of the area was difficult in both fires.

Long lines of traffic flooded the roads. It was gridlock for a time in some areas like the Shiloh Road approach to Hwy 101. If hundreds of vehicles/people are added to an evacuation, nobody will be going anywhere, with a very strong chance that people will die. For that reason alone, this proposal is a ridiculous and ill-conceived idea. Since it's proposal in September of 2021, the casino resort has been at the forefront of discussion in the greater area. I am yet to meet one person who thinks this proposal is a good idea and will benefit the area. I have heard only the opposite.

I could go on and on, detailing other issues such as noise and light pollution, the existing greenbelt and clear ecological damage, the decline of quality of life and property values, along with years of severe drought.

Thank you for your time and consideration of my thoughts.

Sincerely,

Clifftun Whittemore
237 Lea Street
Windsor, CA 95492



Cliff Whittemore

cliff@westcoastwinereserve.com

3100 Dutton Ave, Ste 102

Santa Rosa, CA 95407

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From: [Anita Hoyt](#)
To: [TribalAffairs](#)
Subject: proposed casino on old redwood hwy & shiloh rd
Date: Monday, June 20, 2022 5:08:01 PM

EXTERNAL

PLEASE, PLEASE, PLEASE, do not approve this casino!!!! Our area cannot tolerate anymore of this type of activity in our bucolic neighborhoods. Business such as this DO NOT BELONG in residential areas! We know that our emergency services (police and fire depts.) are overworked and understaffed already. How could this idea pass any common sense justification???

Please vote it DOWN!

Thank you, Anita and Harvey Hoyt

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From: [Kacy DeHaven](#)
To: [TribalAffairs](#)
Subject: Proposed Casino
Date: Monday, June 20, 2022 8:59:45 PM

EXTERNAL

My name is Kacy Dehaven, I have lived at 237 Lea street since I was 9 years old. Growing up our neighborhood has always been quiet, as we have a lot of older residents. Some of my favorite memories growing have been my early morning walks with my mom up Shiloh Road and to the Regional Park. We watch the sunrise and it's seems like it's just us and nature. The proposed casino resort would be across from my house, the same road I have walked and jogged up many times for my own peace and health. This casino threatens my peace in many different ways, for one the many months of construction with the noise and even after the casino would be built it would be taking away my beautiful walk with the vineyards by my side. Secondly I would not feel comfortable waking up before the sun to take my walks anymore in fear that someone leaving the casino at that time either tired or drinking is on the road as well. This also doesn't make me feel safe walking alone in my once quiet neighborhood. The Casino will bring many people this way who may wonder over here looking for trouble.

There are many other concerns other than the noise and safety of course, but being a young women in this day and age, my safety walking in my neighborhood is a huge concern for me. I really hope I am able to keep my peaceful environment.

Sincerely,
Kacy Dehaven
237 Lea Street
Windsor, CA

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From: vxchico@aol.com
To: [TribalAffairs](#)
Subject: proposed casino
Date: Monday, June 20, 2022 4:04:52 PM

EXTERNAL

I feel strongly that this casino proposal should not move forward. It is totally inappropriate for this area. Where is the water coming from to support such a project? How will the increased traffic affect life in the subdivision there? The tribe is not even from the area where proposed casino would be. Don't we already have enough casinos in Sonoma county?
Please do not go forward with these plans.

Karen Sumpf
registered Sonoma county voter

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From: [Michael Moran](#)
To: [TribalAffairs](#)
Subject: Proposed Casino/Shiloh Rd.-Windsor
Date: Monday, June 20, 2022 9:01:34 PM

EXTERNAL

Tribal Affairs,

I am writing with extreme opposition to the proposed casino resort at Shiloh Road in the Northern Santa Rosa/Windsor area. Since day one in hearing about this proposal I have been stressed about the effects this would have in not just my neighborhood, not just Santa Rosa/Windsor but also the greater Sonoma County area. The proposed location is a first a residential area and secondly an agricultural area. The massive operation of a casino resort would be extremely detrimental to all facets of life in the surrounding area: homes and families, parks for recreation and youth sports, schools, churches, infrastructure, etc.

I live near Shiloh. The proposed casino resort would be right out my back door and across Shiloh Road. The most disturbing issue to me, as a resident, is the ability to evacuate myself and my family when the next wildfire happens. We were evacuated in both 2017 and 2019. It was terrifying and in 2019 I was convinced from reports that our house was gone. Thankfully, the fire was stopped about a quarter mile from our house and only 100 yards from the houses on Lockwood Drive. Getting out of the area was difficult in both fires. Long lines of traffic flooded the roads. It was gridlock for a time in some areas like the Shiloh Road approach to Hwy 101. If hundreds of vehicles/people are added to an evacuation, nobody will be going anywhere, with a very strong chance that people will die. For that reason alone, this proposal is a ridiculous and ill-conceived idea. Since its proposal in September of 2021, the casino resort has been at the forefront of discussion in the greater area. I am yet to meet one person who thinks this proposal is a good idea and will benefit the area. I have heard only the opposite.

I could go on and on, detailing other issues such as noise and light pollution, the existing greenbelt and clear ecological damage, the decline of quality of life and property values, along with years of severe drought.

Thank you for your time and consideration.

Sincerely,

Christina Moran
Amie Drive
Windsor

Sent from my iPhone

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From: [Sidnee Cox](#)
To: [TribalAffairs](#)
Subject: Re: Koi Nation Shiloh Resort and Casino Project
Date: Monday, June 20, 2022 7:22:20 PM

EXTERNAL

Hello Officials from Tribal Affairs,

Please see the letter below that I sent to the Director Amy Dutschke at BIA several days ago.

I appreciate your time and attention to this important matter.

Best regards,
Sidnee Cox

To: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Hello BIA Director Dutsche,

Thank you for this opportunity to submit public input regarding the environmental impacts of the proposed Koi Nation Resort and Casino Project on Shiloh Road adjacent to Windsor, CA. There are many environmental impacts that need to be studied while considering the placement of this proposed casino.

First of all, I was involved in a citizen's group that helped shape Windsor as it became incorporated as a town in 1992. Shortly thereafter, a community separator and Urban Growth Boundary was established around Windsor to provide critical open space. This open space proved to be a vital firebreak during the Kincadee fire in 2019 that threatened to destroy our town. The flames came within a half mile of our neighborhood on East Shiloh.

In addition, much of Shiloh Regional Park burned in the 2017 Tubbs Fire. I watched the huge red glow on Shiloh Ridge as the park was burning during this disaster! Only a change of wind stopped the fire from racing down into our valley and the neighborhoods on East Shiloh. That was the night when 4,658 homes were destroyed.

Secondly, in our fire prone area, evacuation routes must be considered. The roads surrounding this proposed location would not be capable of providing safe evacuation routes for both the existing neighborhoods as well as the patrons and workers at the proposed casino resort complex.

Please see this short video clip from ABC News: <https://abc7news.com/kincade-fire-in-windsor-ca-cal-map/5652149/>

Also please see this video showing how the fire impacted Shiloh Regional Park and the evacuations from our area:

<https://newsofthenorthbay.com/2019/10/live-cal-fire-command-center-at-shiloh-regional-park-in-windsor/>

Third, the impact of intensive development in this agricultural area, which includes 850 acres of Shiloh Regional Park, would greatly endanger the wildlife and ecosystem of this protected region. Please study the impact that vehicle pollution, groundwater pollution (and depletion), light pollution, noise pollution and toxic emissions of all sorts would impact this park and the surrounding area.

Fourth, other local tribes in our area oppose this project.

In conclusion, there are many other issues that need to be considered in addition to the ones above mentioned. Please study them all in as you make your decisions.

Thank you for your time and efforts.

Sincerely,

Sidnee Cox
5846 Leona Court
Windsor, CA 95492

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From: tmadura@sbcglobal.net
To: [TribalAffairs](#)
Subject: Shiloh Road Casino
Date: Monday, June 20, 2022 7:35:33 PM
Attachments: [New casino comment letter June 19^J 2022.pdf](#)

EXTERNAL

Please see my above letter.
Thank you

Tim Madura
707-815-6983
tmadura@sbcglobal.net

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Tom Thornsley
tomthornsley@msn.com

June 21, 2022

To: tribalaffairs@sonoma-county.org & chad.broussard@bia.gov

Subject: "Koi Nation Shiloh Resort and Casino Project", Notice of Preparation of an Environmental Assessment / Tribal Environmental Impact Report

To Whom it may concern:

I have been made aware of the desire for the Koi Nation to establish resort and casino on the southeast corner of Shiloh Drive and Old Redwood Highway just outside of the of Windsor. The idea of a casino in this rural area possess a lot of questions regarding likely impacts it could have on the environment and the quality of life for those currently enjoying their peaceful lifestyle away for intense urban development. The NOP provide insufficient detail about the extent of the project and there are numerous issues to consider in the preparation of you environmental documents. Although the Proposed Project includes the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site, it fail to provide the building square footages, capacities, operational hours, event scheduling. All of these missing elements are necessary to know in order to provide detailed comments about likely impacts. Because of these shortcomings, the NOP must be recirculated with the project details well defined.

In the NOP it states the following:

"To reduce paperwork and eliminate redundancy, the TEIR will be prepared in coordination with the Environmental Assessment EA, resulting in a joint "EA/TEIR" (herein referred to as an "EA"). Thus, this notice is also intended to fulfill the anticipated requirements of the Tribal-State Compact to provide interested parties with information describing the Proposed Project and its 2 of 8 potential significant effects and the opportunity to provide comments related to the scope and alternatives to be addressed within the environmental document. Information is available online at shilohresortenvironmental.com."

The level of detailed information about the project can only give someone a limited idea of the potential extent of impacts associated with this project. The 2 potential significant effects are not outrightly defined thus no way to know what they may entail. Alternatives are not discussed in the NOP thus it is expected that during the review period of the EA/TEIR the public will be permitted to provide comments and suggested mitigation measures prior to approval.

Without detailed knowledge of the Project's full intent, one can only speculate on what must be considered in preparation of your environmental document. Below are the speculative ranges of things I believe need to be addressed.

1. Size of the Casino (square feet/gaming machines & tables)
2. Size of the hotel/resort (room count)
3. Number of restaurants (seating capacity)
4. Expected number of employees
5. Size of the conference facilities (capacity)
6. Size and capacity of the event center
7. Expected activity level of the event center monthly
8. Operating hours for all facilities
9. Height/stories for all facilities
10. How will you minimize the visual impact of any buildings over 3-stories?
11. All light standards must be low profile – not taller than 25 feet.
12. All lighting must be shielded and in the lower wave lengths to limit light scatter and maintain a “Dark Skies” environment as expected in this rural area.
13. Number of parking spaces and how they are calculated
14. Parking lots shall be provided with sufficient tree planting to shade the asphalt/parking stall to avoid creating of a heat sink on site.
15. How will the operators of the Project deal with undesired “off-site” parking during heavy activity? This concerns street parking and parking at the public park nextdoor.
16. Quantity of land subject to development and disposition of the remaining vineyard
17. Extent of adjacent and off-site roadway improvements necessary to accommodate the project
18. Defined the extent of traffic impacts beyond the project site
19. Defined percentage of impacts to roadway/intersections off-site and how those improvements will be made.
20. Mitigate all associated infrastructure impacts beyond the project site affecting the Town of Windsor and Sonoma County.
21. The project will likely impact the single stop intersection of Fulton Road at Old Redwood Highway and the Highway 101 / Shiloh interchange and they must be improved meet associated project traffic impacts.
22. Expect to see Development Agreements with the Town of Windsor and Sonoma County for an appropriate level of annual financial compensation to offset community and infrastructure impacts comparable to sales and property tax collected to pay for these items?
23. Who will provide fire and police services to the project and how are they compensated?
24. How will you deal with traffic impact should there be special events?
25. Excessive traffic into the area generates more air pollution/greenhouse gases – how will they be mitigated?
26. How will you deal with water run-off from all the improved impervious surfaces? Don't believe there is a storm drain system in the area to handle overflow of any retention basins. How will overflow be addressed?

27. What will be put in place to prevent runoff spillage into Pruitt Creek?
28. Why can't the vineyard be used as a Koi Nation business and livelihood? This is a viable alternative.
29. Please provide a map of the Koi Nation's ancestral lands.
30. Provide the population of the Koi Nation's people.
31. Where do they commonly reside at this time?
32. Outline who qualifies as a member and how a member's heritage is proven.
33. How will the Project's operations comply with State and local recycling requirements?
34. Will this be a smoke free facility?
35. Will there be an opportunity to comment when EA/TEIR is released?

As previously mentioned, it is hard to offer more precise comments with knowing the complete project details. It is expected that there will be an opportunity for a formal review of the final proposed project, the list of alternatives, and the full environmental assessment to which more precise comments can be provided and considered. Should you have any comments feel free to contact me via email.

Sincerely,

A handwritten signature in black ink that reads "Tom Thornsley". The signature is written in a cursive, flowing style.

Tom Thornsley

tomthornsley@msn.com

From: [William Stites](#)
To: [TribalAffairs](#)
Subject: Casino opposition
Date: Tuesday, June 21, 2022 1:05:12 PM

EXTERNAL

I am writing this email in opposition to the proposed casino In Windsor on the corner of old Redwood Highway and Shiloh Road. The Koi tribe has no tribal connection to Sonoma County. This is a semi rural area that would be destroyed and downgrade the neighborhood. The traffic in the area would be prohibitively noisy and affect the conditions of the roads at taxpayers expense. We are on water rationing so why would you build a casino and hotel complex. How much of the Public Safety such as fire, ambulance, police protection, 911, etc. will the taxpayers be subsidizing?

I strongly oppose this project! We have a village and community here that would be totally destroyed with the addition of this casino and hotel! I have lived in Santa Rosa since 1964 and seem different projects built that never should've been but this casino would be the absolute worst!

Thank you for giving me the opportunity to express my feelings.

William H Stites

Sent from my iPhone

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From: tomthornsley@msn.com
To: chad.broussard@bia.gov; [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Tuesday, June 21, 2022 4:42:56 PM
Attachments: [Casino NOP Letter.pdf](#)

EXTERNAL

Attached are my comments regarding the casino project. Please add them to the public record. It is my expectation to be kept apprised of this project as it continues through the review process.

Thanks,
Tom Thornsley

Sent from [Outlook](#)

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From: [Kathleen](#)
To: [TribalAffairs](#)
Subject: Koi Nation Shiloh Resort and Casino Project
Date: Tuesday, June 21, 2022 7:29:03 AM

EXTERNAL

Shiloh Resort and Casino Project

Dear Tribal Affairs

I am writing to voice our strong opposition to the proposed casino off of Shiloh Road. As you are no doubt aware, the Koi Tribe from Lake County has recently purchased vineyard acreage adjacent to a series of single-family residential neighborhoods, located at the crossroads of Old Redwood Highway and East Shiloh in North Santa Rosa/Windsor. They have announced plans to build a large casino complex, including multiple restaurants and a 200-room hotel. Our neighborhood, and all neighborhoods in the surrounding area, are very distressed by this plan and ask for your support in stopping this development. While we understand the need to address the wrongs committed against indigenous people in our country, we are confident that this proposed development is not an appropriate manifestation of those efforts. There are several reasons for our lack of support:

- It is well documented that the Koi tribe comes from Lake County. That is their tribal heritage and land. They did have a trade route through Sonoma County. All history and knowledge of this trade route shows that the path followed the Russian River and did not pass through the Windsor area. That was not the direct path followed. There should be no claim to this land as tribal land for a tribe from Lake County, either inherently or via a trade route. Rather, the land is prime real estate that is attractive. That does not justify tribal trust land jurisdiction.
- The neighborhoods adjacent to this proposed casino are middle class, mostly long-time resident neighborhoods. We are families, retired couples and citizens that have invested in our properties for a lifetime, planning to retire in the area because it is quiet, safe and family oriented. To introduce a casino in the midst of these neighborhoods would immediately and irreparably damage both the quality of the residents' lives as well as their lifetime investments.
- It is well established that casinos cause an increase in prostitution, drunk driving and crime in the immediate area. In the Thompson, Gazel and Rickman study of 1996, the researchers found that, "that the casino or near casino counties had rates of major crimes 6.7% higher than expected and Part II offense arrest rates were 12.2% higher than non-casino counties. They concluded that the **introduction of casino gambling is associated with increased crime.**" (Thompson, Gazel, & Rickman, 1996). This increase in crime will not be isolated in a remote area, focused on the casino. It will spread into multiple nearby residential neighborhoods.
- In addition, there are several elementary schools and two high schools within a 7-mile area of the proposed casino. This increase in crime will play out in the lives of these youth and, without a doubt, be an enticement to them in terms of underage drinking and possible crime.
- Traffic in our area has already been increased due to the shopping center on Shiloh and the Sonoma County Airport area. Most days the commute to work involves a 20-minute journey from Old Redwood highway to the freeway access at Shiloh and 101. There is no other clear pass for an on ramp, since all potential pathways run directly through residential neighborhoods. There is no place for traffic to a casino and 200-room hotel to go but onto Shiloh and Old Redwood Highway. This will create incredible backups and traffic issues, increase accidents and clog the flow of movement for everyday life in the area.
- Our neighborhoods that directly adjoin the proposed casino property have all been evacuated consistently during fires in Sonoma County. The evacuations cause traffic. In the Tubbs fire, as you know, lack of planning for traffic in emergencies caused deaths due to people not being able to drive or get to safety fast enough. We are very concerned that a casino will exacerbate this issue in our area, causing horrific impacts that can be avoided.
- While we understand that tribal land developments are not held to CEQA standards, the surrounding areas are. We have red tailed hawks, barn owls, fox, flowers, bobcats and many other forms of wildlife in our area. We see them frequently. There is no way that a development in that vineyard will not significantly damage the environmental surroundings and wildlife present.
- We already have infrastructure issues in our area. Cable lines are overloaded and have not been upgraded. Internet is not strong. To put the size of a development proposed, with the individual televisions, internet connections and technology needs required of a hotel and casino, would completely damage the ability of our neighborhoods to enjoy such needed activities as working from home or basic recreation such as watching a movie at home. In addition, we are in a drought and already limiting our water intake, plant care, etc at the request of the city and county. To put this large a facility in the middle of a fire zone affected by drought seems irresponsible and very inequitable to the local residents being asked to cut back.

For all these reasons, we feel this casino must be stopped. We are asking for your support in stopping this development. We are happy to discuss any further points with you. Thank you for your consideration.

Respectfully,

Scott and kathleen Huhn



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From: [Richard Abend](#)
To: [TribalAffairs](#)
Subject: Koi nation Shiloh resort and casino proposed project
Date: Tuesday, June 21, 2022 4:19:26 PM

EXTERNAL

Firs of all this is not enough time for the whole community to give input to this horrible proposed project . This area is composed of family parks , wild life parks ,residential, churches and schools . Absolutely not a place for a Las Vegas in out front and backyards ! These type of activities attract traffic sex , drug traffic , drinking and driving and a big impossible amount of a public population to surrounding areas . Our community area can not and should not have to be faced with this ! On top of those problems our community infrastructure is difficult to evacuate in the event of a fire or other disaster... proven during last two fires! Also the ground water impacts on community well areas is of big concern for a big population project like this . The proposed property is and always has been a green belt barrier of open space and agriculture !

Thank you , Richard Abend , 5925 old redwood Hwy Santa Rosa ca 95403

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From: franmarieo@aol.com
To: [TribalAffairs](#); [district4](#)
Subject: Proposed Casino
Date: Tuesday, June 21, 2022 5:04:32 PM

EXTERNAL

To Whom It May Concern:

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 45+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, the Town of Windsor will be most seriously impacted - again NOT in a positive manner. More cars, more crime, increased public safety expenses without the benefit of increased revenues (the casino is actually in Santa Rosa vs. Windsor). When people in the area evacuated three years ago, the roads were clogged and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose the building of this casino.

Thank you,
Frances Oliver
(707) 484-5053

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From: [Pamela Higi](#)
To: [TribalAffairs](#)
Subject: Shilo rd
Date: Tuesday, June 21, 2022 12:10:20 PM

EXTERNAL

I strongly oppose the casino site being considered.

Some reasons but not all are my concerns

Quality of neighborhood activities

Negative ecological impact

Noise

Proximity to residential neighborhood and park

Loss of open space

Wildfire risk drought/ water availability

Thank you

Pamela Higi

Sent from my iPhone

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From: [craigslist reply](#)
To: [TribalAffairs](#)
Subject: Pee Dee Indian Nation-Beaver: Available in Morning?
Date: Wednesday, June 22, 2022 7:11:11 AM

EXTERNAL

Hi there,

Hoping everything is great.

Wanted to see if I can help Pee Dee Indian Nation-Beaver slash as much as 45% on it's phone bill by switching to a better carrier than you have now.

Does top-rated phone service at a better rate (with best technology) sound good? Would just need to know the easiest number to reach you to get this rolling.

Best,

Maine Bubly
Comm. Specialist | Conventi

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From: [JAMES BOISSIER](#)
To: [TribalAffairs](#)
Subject: Proposed Koi tribe casino near Windsor/Santa Rosa
Date: Wednesday, June 22, 2022 6:20:46 AM

EXTERNAL

· I am strongly opposed to building a casino near Windsor/Santa Rosa for the following reasons.

Wildfire Risk

- **Proximity to Residential Neighborhood, Churches, Schools**
- **Infrastructure Roads**
- **Loss of Open Space/Greenbelt**
- **Negative Ecological Impact**
- **Noise**
- **Drought/Water Availability/Mandatory Water Rationing**
- **Impact of Ignoring Zoning Restrictions**
- **Public Safety**
- **Quality of Neighborhood Activities**
- **No Significant Connection to the land by the Koi Tribe**
- **Emergency Response Time**
- **Greenhouse Gases**
- **Decline in Property Values**

Jim Boissier
153 Barrio Way
Windsor, CA 95492

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From: [Brian Siewert](#)
To: [TribalAffairs](#)
Subject: Shilo Casino Under Water - No!!
Date: Wednesday, June 22, 2022 11:38:43 AM

EXTERNAL

Dear Tribal Elders,

Our household is so against this casino for many reasons, but the most concerning to me is one no one seems to be mentioning. Highway 101 and Shilo exit has flooded twice in the last three years, closing the freeway for hours. Old Redwood highway at the high school just south of River Road floods barring that way of evacuation. As weather events get more severe, what is the egress for hundreds of casino guests and employees, plus the locals already here to evacuate in an emergency?

Second, our dear neighbors who are independent business owners bringing construction services and tax dollars into this town and county, have already looked at property in Idaho because they do not want to raise their family of four children in a town that hosts a casino.

Flooding and family values, not to mention this is not a local tribe.

No to this casino.

Brian Siewert
724 Natalie Drive
Windsor, CA 95492

--

Brian Siewert
When doors close, look for the windows

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From: [Dahdri McCormick](#)
To: [TribalAffairs](#)
Subject: CASINO OPPOSITION
Date: Thursday, June 23, 2022 2:52:40 PM

EXTERNAL

To Whom it May Concern:

This is my vocal opposition of the proposed Casino in the area at Old Redwood Highway/East Shiloh Road in Windsor. I am a 30-year resident of Sonoma County. I have raised my children in the vicinity of this proposed project and I currently reside in close proximity of this project.

The proposed location of the casino is not conducive to the character of this part of Windsor. Located in close proximity are established neighborhoods, agriculture, churches, parks, playgrounds and baseball fields all of which will suffer tremendously by the proposed project.

The small 2 lane Old Redwood Highway as well as East Shiloh Road could not handle any excess traffic that would be brought on by this project. In addition to traffic congestion the environmental impact to this area brought by traffic, noise and destruction of established agricultural land, the area is set up for an impact to residents, their children and the overall "culture" this area currently holds.

As seen in the previous years of wild fires, these roads could not possibly handle more congestion especially in the event of future fires or other catastrophic events.

This particular Koi nation has no known or significant connection to this land or the Town of Windsor. This tribe should investigate land or locations in the vicinity of their origin. In addition, the ignorance of local zoning and building restriction only causes the current area to decrease land values for all those in the surrounding areas.

This neighborhood is not the location for a proposed location. Not even a "resort" with high-end projections. This is a neighborhood with families. These families take walks, play ball, shop and attend churches in this area.

A proposed casino will increase traffic, crime, decrease the current green space and jeopardize emergency time to respond to any future emergencies in the area.

There are other areas more conducive to this type of business. Please keep our Town of Windsor a family community—the reason we chose to live here in the first place.

Thank you for listening,

Dahdri McCormick
5811 Faught Road
Santa Rosa CA 95403
dahdrimc@icloud.com

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From: [Paulette Marshall](#)
To: [TribalAffairs](#)
Subject: NO! Casino in Windsor
Date: Thursday, June 23, 2022 4:02:22 PM

EXTERNAL

To whom it may concern,

I am a resident of Windsor, my family and I have lived here for nine years. We absolutely love this beautiful little town and all that it has to offer. We have two small school-age children that love the quaint feel of Windsor and the safety that comes along with that.

The main reason I am Writing is to express my deep concern for the proposed Koi Nation casino located on Old Redwood Highway & Shiloh Rd. This proposed location is in the heart of a neighborhood And would absolutely negatively impact everything around it. As a resident, here are my biggest concerns:

- Wildfire Risk
 - Proximity to Residential Neighborhood, Churches, Schools
 - Infrastructure Roads
 - Loss of Open Space/Greenbelt
 - Negative Ecological Impact
 - Noise
 - Drought/Water Availability/Mandatory Water Rationing
 - Impact of Ignoring Zoning Restrictions
 - Public Safety
 - Quality of Neighborhood Activities
 - No Significant Connection to the land by the Koi Tribe
 - Emergency Response Time
 - Greenhouse Gases
 - Decline in Property Values

PLEASE PLEASE PLEASE Consider the voices of all of the Windsor residents!!!!

Thank you for your time,

Paulette Marshall

Sent from my iPhone

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From: [Dale Beltz](#)
To: [TribalAffairs](#)
Subject: Sonoma County proposed Casino by KOI tribe.
Date: Thursday, June 23, 2022 1:06:17 PM

EXTERNAL

This should NOT be approved. My wife and I are long time Santa Rosa residents 35 years in Sonoma County. We strongly oppose it. The Koi tribe has NO ancestral ties to this area. Five local tribes oppose this. There are already 2 other casinos in the area. River Rock Casino and Graton Casino. Sonoma County opposes this.

Respectfully,
Dale and Sandy Beltz
1322 Tuliptree rd.
Santa Rosa CA. 95403

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From: [Hollis Stavn](#)
To: [TribalAffairs](#)
Subject: Koi Casino Oppose
Date: Friday, June 24, 2022 10:12:52 AM
Attachments: [Shiloh.pdf](#)

EXTERNAL

attached PDF

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Dr. Hollis Stavn O.D.

Glaucoma Certified

5674 Carriage Ln
Santa Rosa CA 95403
707-527-9137

June 22, 2022

Amy Dutschke Regional Director
BIA Pacific Region
2800 Cottage Way Sacramento CA 95824

cc chad.broussard@bia.gov

RE: Koi Nation of Northern Ca Shiloh Resort and Casino Project.

Dear Amy Dutsch and Chad Broussard

I am writing to vehemently oppose the Koi Nation Shiloh Road Casino Project for so many reasons. Among them is this is near a residential area immediately adjacent to housing of Larkfield, Windsor, and the roads from Shiloh to Healdsburg.

The Highway 101 corridor is already congested by folks driving between Santa Rosa and Windsor.

Adjacent to Hwy 101 is a shopping center of Walmart and Home Depot and many ,many other stores which also significantly impacts traffic. There simply is no more room for more traffic in normal times let alone a fire which would be catastrophic as Highway 101 is the only way out.

Being a resident of this area near Carriage and Faught Lane to Wikiup drive- this area has been impacted by serious fire at least 3 of the last 5 years which last time reached Windsor as well. This area seems to be at the confluence of 3 different fire paths one of which comes over Wikiup Drive from Mark West Springs Road and Napa and Calistoga, and the other over Shiloh and another down from Healdsburg. In short the fires always end up here. This area is also home to Sutter Hospital.

We are still in a drought and there is still extreme fire risk. The danger is significant and real.

We also are in a water crisis. Any project of this size would also affect diminishing water capacity..

I hear the KOI nation is Not local to Sonoma County in its history and I believe all of our County Supervisors oppose this project as well as other Indian Nations.

There is also a severe Dr Shortage In Santa Rosa that impacts patient care and emergency care along this corridor.

I cant think of a worse idea to put in that location as it is detrimental to residential neighborhoods to safety to traffic and to security. This is a really stupid idea. It could be as simple as someone going there throwing a cigarette into the brush and burning down the north half of Santa Rosa.

Sincerely

Hollis Stavn OD.

From: [Chris Lamela](#)
To: [TribalAffairs](#)
Cc: [Anushka Coverdale](#)
Subject: In opposition to proposed Casino in Windsor
Date: Saturday, June 25, 2022 11:41:21 AM

EXTERNAL

In opposition to proposed Casino in Windsor

We live in southern Windsor, a mere block away from the proposed casino. We live in a peaceful upscale neighborhood, many living here for over twenty years. The notion of a mega-scale casino only an earshot away is preposterous. We strongly disagree with this development for a number of reasons:

1. The traffic on Shiloh road will be constant. That will disrupt the tranquility of our community.

2. The night-time lighting will illuminate the sky and disrupt our night-time peacefulness.

3. We live in a highly fire-prone area, having had to evacuate every Fall four of the last five years. When another fire comes – and it will – we worry about our ability to evacuate safely when there will be so many vehicles trying to leave the casino at the same time.

4. Casinos are notorious for drawing violent crime, prostitution and drug sales. This will have *enormous* negative impact on our lifestyle and create a very dangerous situation for each of us.

5. The crime that will be drawn by the casino will turn our upscale neighborhood into a “shopping district” inviting burglaries, car break-ins and general mayhem.

6. We believe this development will greatly depreciate the value of our homes. Many of us are retired and depend on our ability to use our home values to sustain our ability to live as we deserve.

We are also dedicated citizens who vote whenever we can and we will remember which government officials help us here – and which

ones do not.

Our community has been committed to stopping this project from the minute it was announced. We are insistent that our voices are heard, our concerns heeded and that this development will be stopped.

- Chris Lamela
chris@chrislamela.com
707-566-8790 PST

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From: [Lorraine Weglarz](#)
To: [TribalAffairs](#)
Subject: KOI Tribal Casino
Date: Sunday, June 26, 2022 4:11:32 PM

EXTERNAL

Proposed Koi Tribal Casino on land unincorporated area of Santa Rosa and close to Shilo Rd/Windsor boundary.

I'm a 78 yr old Senior and in Senior Mobile home Community on Old Redwood Hwy 1 1/2 miles north of Shiloh. This tribe has not done it's due diligence and scope of work very well at all. Old Redwood Hwy is basically a 2 lane road way from north of Mendocino Rd in Santa Rosa all the way through the Town Of Windsor. Much of this road is through Residential areas with family neighborhoods as well as affordable housing (manufactured/mobile homes) for Seniors. This road has already become a short cut route for drivers heading further north to Healdsburg, Cloverdale. It also an Evacuation Route for Eastern side of Highway 101. How would the Casino deal with a massive evacuation in a sudden wildfire situation??? A lot of people would be trapped with no way escape route! This would easily become a catastrophic situation! A disaster waiting to happen. I personally have worked with cities & towns in terms protecting their records & information systems in the event of fire & earthquake scenarios. I don't see that the tribe has even thought about such things. The County should Not allow any further action by the tribe until the Tribe prepares & provides such an action plan in writing and it is assessed by the County's Emergency management agency for viability. I would be willing to work with both parties to develop such a plan. Lorraine Weglarz 52 Shamrock Circle Santa Rosa CA 95403 707-687-5618.

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From: [Kurt Shaver](#)
To: [TribalAffairs](#)
Subject: No Casino at Shiloh
Date: Sunday, June 26, 2022 9:55:22 PM

EXTERNAL

My wife and I live in the hills at the end of Shiloh Road. Having suffered through wildfires of various degrees over the last five years, we are very concerned about the ability to evacuate should a casino be allowed which would inevitably bring many more cars and people to evacuate.

PLEASE CONSIDER THE FOLLOWING CONCERNS AND ENVIRONMENTAL HARMS:

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- NOISE 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT
- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;
- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS
- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF GROUND WATER AND WELLS
- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE
- LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

Kurt Shaver
735 Shiloh Canyon
Santa Rosa, CA 95403

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From: [A.P. Marsten](#)
To: [TribalAffairs](#)
Subject: Reject Shiloh Casino Resort
Date: Sunday, June 19, 2022 5:57:55 PM

EXTERNAL

Dear Tribal Affairs Council,

A 400 room casino resort proposed by the Koi tribe of Lake County would destroy our bucolic neighborhood in Sonoma County. The amount of water required for this hotel with six restaurants is staggering. We are already under water rationing, and as an independent nation, the Koi tribe could ignore all of the state and local regulations and take as much water as they want, to the detriment of the whole of Sonoma County and its agricultural dependence. Furthermore, the casino would sit in the midst of several wildfire escape routes. The Tubbs Fire took everyone by surprise and dozens of people died. We have evacuated several times since in the last few years. We may have only minutes of warning to leave and the congestion from that casino evacuation could cost lives.

The Koi Casino is a Disaster waiting to happen.

A. P. Marsten

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Congress of the United States
Washington, DC 20515

June 30, 2022

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, California 95825

Dear Mr. Broussard:

As the Bureau of Indian Affairs (the Bureau) prepares its Environmental Assessment and Tribal Environmental Impact Report for the Koi Nation's application to acquire 68 acres of land into trust for a casino in Sonoma County in the Second District of California, we write to you to voice concern and our opposition to the project. While we remain champions for tribal interests, we would like to bring to your attention serious concerns raised by both the tribes with ancestral ties to the land and the neighboring constituents that render the proposed plans inappropriate for the area.

Federal law requires that a restored tribe have a "significant historical connection" to the land where it proposes to game, but the land in question is over 50 miles from the Koi Nation's ancestral land in the Lower Lake area of Lake County. The Koi Nation lacks evidence of a historical connection such as ancestral villages, burial sites, or subsistence use of the land. Further, the tribes that *are* indigenous to Sonoma County including the Federated Indians of Graton Rancheria, Dry Creek Rancheria Band of Pomo Indians, Cloverdale Rancheria, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, and Lytton Rancheria oppose both the proposed project and the Koi Nation's ancestral claims to the land. These tribes that have documented historical connections to the area will also have cultural and archeological concerns about the proposal that the Bureau must address. The Sonoma County Board of Supervisors also shares concern and passed a resolution opposing the establishment of this casino within the County.

In addition, we have heard from worried constituents in the area about the intended use of the land for a casino. The proposed project would be located in a residential area with elementary schools, parks and religious centers in close proximity. The anticipated traffic and construction from a casino would create unwanted noise and pose a danger to these residents – not to mention its associated air quality and climate impacts. Increased traffic also poses a serious concern when considering wildfire evacuation routes and the thousands of vehicles that could be added to the road from the project.

We also cannot ignore the obvious environmental pressure this project will create. A new casino of this magnitude, and its construction, will increase water pressure on the Russian River, as well

as generate possible runoff and groundwater impacts from converting what is currently open space into impermeable surfaces.

Finally, we would like to request that the comment period for this public scoping process be extended. With multiple Federal holidays in the past month and the level of community interest, it seems appropriate that your agency extend the deadline for public comment beyond 30 days.

Thank you for your full, fair and serious consideration of our request for you to reject the Koi Nation's application to acquire this land in trust and the proposed casino.

Sincerely,



Jared Huffman
Member of Congress



Mike Thompson
Member of Congress

Comment Letters

Tribes



DRY CREEK RANCHERIA
BAND OF POMO INDIANS

RECEIVED

SEP 30 2021

DCN: IA00010878
Executive Secretariat - Indian Affairs (ESIA)

September 23, 2021

The Honorable Bryan Newland
Assistant Secretary – Indian Affairs
U.S. Department of the Interior
1849 C St, NW, MS-4660-MIB
Washington, DC 20240

RE: Opposition to Koi Nation application to take land into trust for Gaming in Sonoma County

Dear Assistant Secretary Newland:

Attached is a Resolution from the Dry Creek Rancheria Band of Pomo Indians in opposition to Koi Nation's application to the US Department of Interior to take land into trust for Gaming in Sonoma County. We respectfully request a copy of the Koi Nation's application to be afforded an opportunity to submit comments and otherwise participate in the Department's regulatory review process.

Sincerely,

Chris Wright, Chairman
DRY CREEK RANCHERIA BAND OF POMO INDIANS

Mailing Address: P.O BOX 607, Geyserville, CA 95441
Tribal Office Address: 1450 Airport Boulevard, Suite 200, Santa Rosa, CA 95403



**DRY CREEK RANCHERIA
BAND OF POMO INDIANS**

**RESOLUTION OF OPPOSITION TO KOI NATION'S APPLICATION TO THE
UNITED STATES DEPARTMENT OF INTERIOR TO TAKE LAND INTO TRUST
FOR GAMING IN SONOMA COUNTY.**

RESOLUTION NO. 21-09-23-Koi Nation-001

- WHEREAS,** the Dry Creek Rancheria Band of Pomo Indians ("Tribe") is a federally recognized Indian tribe organized under Articles of Association adopted on September 13, 1972, approved by the Deputy Assistant Secretary of the Interior on April 16, 1973, and amended effective September 22, 1979, by virtue of the powers inherent in tribal sovereignty and those delegated by the United States of America; and
- WHEREAS,** pursuant to Article IV of the Articles, all powers and responsibilities of the Tribe are vested in the Tribal Council, which may delegate powers to the Tribal Board of Directors ("Board"); and
- WHEREAS,** pursuant to Article VII of the Articles, the Board shall take such actions as are necessary to carry into effect the ordinances, resolutions, or other directions of the Tribal Council and represent the community in all negotiations with local, state, and federal governments; and
- WHEREAS:** Koi Nation has submitted an application to the United States Department of Interior ("Department") seeking to acquire 68 acres of land in trust for a casino near Santa Rosa, Sonoma County, southeast of Windsor.
- WHEREAS:** the site the Koi Nation has selected is located approximately 50 miles from the Koi Nation's homeland in Lake County -- well outside the Koi Nation's ancestral territory; and
- WHEREAS:** the Koi Nation is a Southeastern Pomo tribe indigenous to Lake County, specifically Lower Lake (Clear Lake), and was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to Lake County where in 1916 a rancheria was acquired for it by the federal government; and
- WHEREAS:** the Koi Nation has never been associated with Sonoma County linguistically or culturally; as Southeastern Pomo, the Koi Nation is not indigenous to nor has any significant historical connection or ties to Sonoma County; and
- WHEREAS:** all of Sonoma County is indigenous to the Southern and Southwestern Pomo language groups, including our Tribe; and
- WHEREAS:** the Koi Nation's attempt to acquire trust land for gaming in the territory of other tribes ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game; and

WHEREAS: allowing Koi Nation to acquire land in trust for gaming purposes in the ancestral territory of other tribes would set a precedent that would disrespect what the law is intended to protect; and

WHEREAS: our Tribe strongly opposes Koi Nation's trust application for a gaming trust acquisition in Sonoma County as an intrusion into our ancestral territory; and

WHEREAS: approval of Koi Nation's application will harm local tribes, including their economic and cultural interests, for the benefit of a single distant tribe.

NOW THEREFORE BE IT RESOLVED THAT the Dry Creek Rancheria Band of Pomo Indians opposes the Koi Nation's application to the Department to acquire 68 acres of land in trust for a gaming facility located near Santa Rosa, Sonoma County, California and requests that the Department said application; and

BE IT FURTHER RESOLVED THAT the Koi Nation's application to acquire trust lands for gaming purposes is an attempt at reservation shopping outside of Koi Nation's traditional territory and within the territory of other federally recognized tribes, including our Tribe; and

BE IT FINALLY RESOLVED THAT our Tribe respectfully requests to be provided a copy of the Koi Nation's application and to be afforded an opportunity to submit comments and otherwise participate in the Department's regulatory review process.

CERTIFICATION


The foregoing Resolution was presented at a Board of Directors Meeting held on September 23, 2021, and was approved with a quorum present and such Resolution has not been rescinded or amended in any way.



Chris Wright
Chairman

9/23/2021

Date



Margie Rojas
Secretary/Treasurer

9/23/2021

Date





**DRY CREEK RANCHERIA
BAND OF POMO INDIANS**

P.O. Box 607, Geyserville, CA 95441

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SEP 23 2021

MAILED FROM ZIP CODE 95403

The Honorable Bryan Newland
Assistant Secretary – Indian Affairs
U.S. Department of the Interior
1849 C St, NW, MS-4660-MB
Washington, DC 20240

20240-





Cloverdale Rancheria

555 S. Cloverdale Blvd. ~ Cloverdale, CA 95425
(707) 894-5775 ~ Fax (707) 894-5727

Gaming
RECEIVED
OCT 19 2021
DCN: IA00010930
Executive Secretariat - Indian Affairs (ESIA)

October 13, 2021

RE: KOI NATION'S APPLICATION IN SONOMA COUNTY

The Honorable Deb Haaland, Secretary
U.S. Department of the Interior
1849 C St. NW
Washington DC 20240

The Honorable Bryan Newland
Assistant Secretary – Indian Affairs
U.S. Department of the Interior
1849 C St. NW, MS-4660-MIB
Washington DC 20240

The Cloverdale Rancheria of Pomo Indians of California is sending our Tribal Council Resolution No. 2021-09-0243 in opposition of the Koi Nation's application to take land into Trust for Gaming in Sonoma County, California.

While the Cloverdale Rancheria recognizes the Koi Nation is a Sovereign Nation, its indigenous area is within the area of Lake County, California which is outside of the area in which they propose to put land into Trust for Gaming. In 1916 a Rancheria was acquired for the Lower Lake (now known as the Koi Nation) by the federal government in Lake County. Sonoma County is approximately fifty (50) miles from the indigenous area of the Koi Nation. With this application it will harm local Tribes in economic and cultural interests and will be outside of their indigenous area. For these reasons we strongly oppose the Koi Nation's application to put land into Trust in Sonoma County, California.

We ask before any decision is made that you consult with the Tribes of Sonoma County to receive input. This is an important and pending issue that can not be ignored because it will set precedence in Indian Country.

Sincerely

Patricia Hermosillo
Cloverdale Rancheria Tribal Chairperson

CLOVERDALE RANCHERIA TRIBAL COUNCIL

Patricia Hermosillo
Chairperson

Silver Galletto
Vice-Chairperson

Maria Elliott
Secretary

Vickey Macias
Treasurer

Sandy Roope
Tribal Representative

CLOVERDALE RANCHERIA

555 S. CLOVERDALE BLVD., SUITE A, CLOVERDALE, CA 95425

PHONE (707) 894-5775

FAX (707) 894-5727

TRIBAL COUNCIL RESOLUTION NO. 2021-09-0243

RESOLUTION OF OPPOSITION TO KOI NATION'S APPLICATION TO THE UNITED STATES DEPARTMENT OF INTERIOR TO TAKE LAND INTO TRUST FOR GAMING IN SONOMA COUNTY.

WHEREAS, the Cloverdale Rancheria of Pomo Indians of California ("Cloverdale Rancheria" and or the "Tribe") is a federally recognized Indian tribe and a sovereign nation with inherent powers of self-governance; and

WHEREAS, Cloverdale Rancheria is governed by its customs and traditions, as described in the Tribal Constitution that was adopted by the General Council through a duly called Election on December 1, 2007 and effective January 1; 2008 (the "Constitution"); and

WHEREAS: Koi Nation has submitted an application to the United States Department of Interior ("Department") seeking to acquire 68 acres of land in trust for a casino near Santa Rosa, Sonoma County, southeast of Windsor.

WHEREAS: The site the Koi Nation has selected is located approximately 50 miles from the Koi Nation's homeland in Lake County -- well outside the Koi Nation's ancestral territory; and

WHEREAS: The Koi Nation is a Southeastern Pomo tribe indigenous to Lake County, specifically Lower Lake (Clear Lake), and was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to Lake County where in 1916 a rancheria was acquired for it by the federal government; and

WHEREAS: The Koi Nation has never been associated with Sonoma County linguistically or culturally; as Southeastern Pomo, the Koi Nation is not indigenous to nor has any significant historical connection or ties to Sonoma County; and

WHEREAS: All of Sonoma County is indigenous to the Southern and Southwestern Pomo language groups, including our Tribe; and

WHEREAS: The Koi Nation's attempt to acquire trust land for gaming in the territory of other tribes ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game; and

WHEREAS: Allowing Koi Nation to acquire land in trust for gaming purposes in the ancestral territory of other tribes would set a precedent that would disrespect what the law is intended to protect; and

WHEREAS: Our Tribe strongly opposes Koi Nation's trust application for a gaming trust acquisition in Sonoma County as an intrusion into our ancestral territory; and

WHEREAS: Approval of Koi Nation's application will harm local tribes, including their economic and cultural interests for the benefit of a single distant tribe

NOW THEREFORE BE IT RESOLVED THAT: the Cloverdale Rancheria opposes the Koi Nation's application to the Department to acquire 68 acres of land in trust for a gaming facility located near Santa Rosa, Sonoma County, California and requests that the Department deny said application.

BE IT FURTHER RESOLVED THAT the Koi Nation's application to acquire trust lands for gaming purposes is an attempt at reservation shopping outside of Koi Nation's traditional territory and within the territory of other federally recognized tribes, including our Tribe.

BE IT FINALLY RESOLVED THAT our Tribe respectfully requests to be provided a copy of the Koi Nation's application and to be afforded an opportunity to submit comments and otherwise participate in the Department's regulatory review process.

CERTIFICATION

The foregoing Tribal Council Resolution was formally acted upon in an email notification with full Tribal Council addressed from Cloverdale, California, at which time the full Tribal Council participated. This Resolution was voted upon and adopted by the Tribal Council, the vote being:

5 For, 0 Oppose, and 0 Abstain


Cloverdale Rancheria Tribal Chairperson

9/23/2021
Date

ATTEST

This Resolution has not been rescinded and shall remain in force until said Resolution is rescinded.


Cloverdale Rancheria Tribal Secretary

09/23/2021
Date

LYTTON RANCHERIA • Lytton Band of Pomo Indians

437 Aviation Blvd • Santa Rosa, California 95403

(707) 575-5917 • Fax (707) 575-6974

**RESOLUTION OF THE TRIBAL COUNCIL
LYTTON RANCHERIA OF CALIFORNIA**
RECEIVED

OCT 20 2021

IA00010937

DCN: Executive Secretariat - Indian Affairs (ESIA)

RE: Opposition to the Koi Nation's Application to the United States Department of the Interior to Take Land into Trust for Gaming Purposes in Sonoma County, CA

RESOLUTION NO. 101321

WHEREAS: The Lytton Rancheria of California, also known as the Lytton Band of Pomo Indians ("Tribe") is a federally recognized Indian Tribe with a reservation located in Sonoma County, California; and

WHEREAS: The Lytton Rancheria of California Tribal Council is the governing body of the Tribe pursuant to Article III of the Tribal Constitution; and

WHEREAS: The Koi Nation has submitted an application to the United States Department of Interior ("Department") seeking to acquire 68 acres of land in trust for a casino near Santa Rosa, Sonoma County, southeast of Windsor, CA; and

WHEREAS: The site the Koi Nation has selected is located approximately 50 miles from the Koi Nation's homeland in Lake County -- well outside the Koi Nation's ancestral territory; and

WHEREAS: The Koi Nation is a Southeastern Pomo tribe indigenous to Lake County, Specifically Lower Lake (Clear Lake), and was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to Lake County where in 1916 a rancheria was acquired for it by the federal government; and

WHEREAS: The Koi Nation has never been associated with Sonoma County linguistically or culturally; as Southeastern Pomo, the Koi Nation is not indigenous to nor has any significant historical connection or ties to Sonoma County; and

WHEREAS: All of Sonoma County is indigenous to the Southern and Southwestern Pomo language groups, including our Tribe; and

WHEREAS: The Koi Nation's attempt to acquire trust land for gaming in the territory of other tribes ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game; and

WHEREAS: Allowing the Koi Nation to acquire land in trust for gaming purposes in the ancestral territory of other tribes would set a precedent that would disrespect what the law is intended to protect; and

WHEREAS: Our Tribe strongly opposes the Koi Nation's trust application for a gaming trust acquisition in Sonoma County as an intrusion into our ancestral territory; and

WHEREAS: Approval of the Koi Nation's application will harm local tribes, including their economic and cultural interests, for the benefit of a single distant tribe.

NOW THEREFORE BE IT RESOLVED: That the Lytton Rancheria of California opposes the Koi Nation's application to the Department to acquire 68 acres of land in trust for a gaming facility located near Santa Rosa, Sonoma County, California, and requests that the Department deny said application.

BE IT FURTHER RESOLVED: That the Koi Nation's application to acquire trust lands for gaming purposes is an attempt at reservation shopping outside of the Koi Nation's traditional territory and within the territory of other federally recognized tribes, including our Tribe.

BE IT FURTHER RESOLVED: That our Tribe respectfully requests to be provided a copy of the Koi Nation's application and to be afforded an opportunity to submit comments and otherwise participate in the Department's regulatory review process.

CERTIFICATION

On Oct 13, 2021, the Tribal Council of the Lytton Rancheria of California, serving as the Tribal Business Board, at a duly called meeting at which a quorum was present, did the pass the attached resolution:

Opposition to the KOI Nation's Application to the United States Department of the Interior to Take Land into Trust for Gaming Purposes in Sonoma County, CA

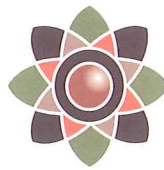
By a vote of 5 ayes; 0 nays; 0 abstentions.

Margie Mejia
Margie Mejia, Tribal Chairperson

Date: 10/13/2021

Danny Ocampo
Danny Ocampo, Tribal Secretary

Date: 10.13.21



FEDERATED INDIANS OF
GRATON
RANCHERIA

RECEIVED

2022 APR 13 AM 11:18

OFFICE OF THE
EXECUTIVE SECRETARIAT

April 12, 2022

The Honorable Deb Haaland
Secretary
U.S. Department of The Interior
1849 C St. NW
Washington, D.C. 20240

Re: Opposition to Koi Nation's Application for Gaming Facility in Sonoma County

Dear Secretary Haaland:

On behalf of the Federated Indians of Graton Rancheria (the Tribe), I write to ask that you reject the Koi Nation's application to acquire 68 acres of land in trust for a casino in our aboriginal territory of Sonoma County.

We believe a Koi casino in Sonoma County would violate federal law and set an incredibly dangerous precedent. As you may know, Federal law requires that a restored tribe have a "significant historical connection" to the land on which it proposes to game (25 C.F.R. 292.12(b)). Department of Interior decisions make clear that "significant historical connection" requires a substantial showing of evidence that is specific to the applicant tribe, not based on evidence regarding a general language group. Moreover, the applicant tribe must show the existence of its ancestral villages, burial sites, subsistence or occupancy and use of the land. The transitory presence of individual tribal members during the 1900s and beyond is simply not enough. As people indigenous to Sonoma County, we know that the Koi Nation cannot meet this standard. Further, if the Koi Nation were to convince this Administration to break with such clear precedent, it would open all of Sonoma County up to casino projects proposed by tribes from many other parts of the State. The Sonoma County Board of Supervisors shares these grave concerns and joins us in our opposition to the Koi proposal. Please see attached County resolution.

Koi Nation has sited its proposed gaming land acquisition approximately 50 miles from its ancestral roots in the Lower Lake area of Lake County, near where the federal government acquired a rancheria for the tribe in 1916. In fact, the Koi Nation was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to the area. But the tribe changed its name in 2012 amid prior attempts to acquire a gaming site in the Bay Area: first near

the Oakland International Airport, then on Mare Island in the City of Vallejo. The Koi Nation now is reviving its attempts to gain access to the Bay Area market through its most recent application.

Koi Nation's attempt to manufacture a connection to Sonoma County is an affront to Sonoma County tribes such as ours. Our people have an extensively documented presence here. Unlike the Koi Nation, the Tribe has distinct names and village sites within the County, our stories and traditions are tied to this cultural landscape, and our ancestors are buried here. Sonoma County is indigenous to the Southern and Southwestern Pomo language groups. In contrast, the Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here. We oppose any efforts by any tribes from outside the area to violate our ancestral territory. For us, this is not merely about gaming but about respecting boundaries and respecting our sovereignty and cultural resources.

We understand that Koi Nation does not have a reservation and accordingly we would support their efforts to establish a reservation in their true homeland in Lake County. Pushing through a proposal to jump into other tribes' territory, however, is wrong and ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game. Koi Nation's application is merely a cynical new twist on their past efforts to acquire gaming sites in Oakland and Vallejo.

Accordingly, we ask that you join us in supporting the Department's longstanding precedent of ensuring tribal governments can demonstrate a "significant historical connection," to the land on which it seeks to conduct gaming and oppose this inappropriate casino development project by the Koi Nation.

Sincerely,



Greg Sarris

Chairman,

Federated Indians of the Graton Rancheria

CC: Reno Franklin, Chairman, Kashia Band of Pomo Indians of the Stewards Point Rancheria
Vickey Macias, Tribal Treasurer, Cloverdale Rancheria of Pomo Indians
Margie Mejia, Chairwoman, Lytton Rancheria of California
Chris Wright, Chairman, Dry Creek Rancheria Band of Pomo Indians

Enclosure (1)



County of Sonoma
State of California

THE WITHIN INSTRUMENT IS A
CORRECT COPY OF THE ORIGINAL
ON FILE IN THIS OFFICE

ATTEST: April 5, 2022

SHERYL BRATTON, Clerk/Secretary

BY *Noelle Francis*

Date: April 5, 2022

Item Number: 13

Resolution Number: 22-0121

☐ 4/5 Vote Required

**Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California,
Opposing the Establishment of a Casino By The Koi Nation, a Non-Sonoma County Tribe,
Within the County**

Whereas, the Sonoma County Board of Supervisors has consistently opposed the establishment of Nevada-style casino gaming in Sonoma County;

Whereas, within the geographic boundaries of the County of Sonoma, lies the historic and ancestral territory of five federally recognized Southern and Southwestern Pomo tribes: the Cloverdale Rancheria of Pomo Indians; the Dry Creek Rancheria Band of Pomo Indians; the Federated Indians of the Graton Rancheria, the Kashia Band of Pomo Indians of the Stewarts Point Reservation; and the Lytton Rancheria Band of Pomo Indians;

Whereas, within the geographic boundaries of Lake County, lies the historic and ancestral territory of seven federally recognized Southeastern Pomo tribes: Elem Indian Colony; Habematolel Pomo of Upper Lake; Big Valley Band of Pomo Indians; Scotts Valley Band of Pomo Indians; Robinson Rancheria; Koi Nation of Northern California (Lower Lake Rancheria); and Middletown Rancheria of Pomo Indians of California;

Whereas, in the 1950s and 1960s the federal government passed a series of laws including the California Rancheria Termination Acts, which among other things ended the federal government's relationship with, recognition of, and benefits to numerous tribes in California, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, several tribes have been restored to federal recognition through legislation or litigation, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and most recently the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, around 2005, after changing its name, the Koi Nation unsuccessfully sought to acquire a site for a Las Vegas-style casino outside of Lake County, near the Oakland International Airport; and in 2014 the Koi Nation unsuccessful sought to establish a reservation and casino on Mare Island in the City of Vallejo;

Whereas, in 2019, the United States District Court for the District of Columbia, issued a decision declaring that the Koi Nation, as a reaffirmed tribe, was an Indian tribe restored to federal recognition; see *The Koi Nation of Northern California v. United States Dept. of the Interior* (D.C. Dist. Ct, Jan. 2019) 361 F. Supp. 3d 14;

Whereas, in September 2021, the Koi Nation, through its LLC, Sonoma Rose, purchased a ± 68.60 acre parcel (Subject Land), located at 222 E. Shiloh Road, on the southeast corner of the intersection of Shiloh Road and Old Redwood Highway, in the unincorporated area of the County;

Whereas, Shiloh Ranch Regional Park is to the east, residential development is north and south, the Town of Windsor is to the north and northwest, and the Sonoma County Airport is to the southwest of the Subject Land which is largely agricultural;

Whereas, in September 2021, the Koi Nation submitted an application to the federal government requesting that the United States Department of the Interior accept the Subject Land into trust for casino gaming and resort purposes under Part 151 of Title 25 of the Federal Code of Regulations;

Whereas, Federal law requires that a tribe restored to federal recognition have a “significant historical connection” to the land on which it proposes to game, 25 C.F.R. 292.12(b);

Whereas, the Koi Nation intends to operate its own gaming facility on the Subject Lands

to the exclusion of Sonoma County tribes;

Whereas, the Board of Supervisors strongly opposes tribes from outside Sonoma County attempting to use their tribal status to place lands within the County in trust and/or to otherwise establish gaming operations within the County;

Whereas, the Board of Supervisors strongly opposes tribes that do not have a clear significant historical connection to a specific property, or do not have authority to exercise jurisdiction in Sonoma County, from taking such property into trust or using such trust property for gaming purposes;

Whereas, the Board of Supervisors continues to encourage Sonoma County tribes to establish boundaries to assist in the determination of trust applications and other tribal issues;

Whereas, the five federally recognized Sonoma County based tribes (Cloverdale Rancheria, Dry Creek Rancheria, Lytton Rancheria, Stewart's Point Rancheria, and the Federated Indians of the Graton Rancheria) each sent the Board of Supervisors a letter or tribal resolution expressing unanimous opposition to the Koi Nation's proposal that the Department of the Interior to accept the Subject Land into trust for gaming purposes due to the Koi Nation's lack of significant historical connection to the Subject Land;

Whereas, gaming projects have significant environmental impacts and other effects on a community, particularly in an area that is predominantly agricultural and residential; and the County's infrastructure may not be able to adequately accommodate the proposed facility and its accompanying traffic, water, wastewater or other impacts;

Whereas, the Board of Supervisors respects tribal sovereignty and takes seriously its government-to-government relationship with tribes, and has worked in good faith with Sonoma County tribes towards a variety of shared goals, including the mitigation of off-reservation impacts stemming from on-reservation development;

Whereas, the Board of Supervisors supports and joins with Sonoma County tribes in opposing the Koi Nation's efforts at obtaining trust lands and establishing a resort

casino in Sonoma County; and

Whereas, allowing a tribe without a significant historical connection to the Subject Land, the area in the vicinity of the Subject Land, or the County of Sonoma generally, sets a significant negative regional precedent:

Now, Therefore, Be It Resolved, that the Board of Supervisors opposes any tribe attempting to establish trust property, exercise jurisdiction, or establish a gaming facility within the historical territory of other tribes without those tribes' explicit permission and partnership and supports an interpretation by the Governor of California, National Indian Gaming Commission, Bureau of Indian Affairs, and Department of the Interior of existing compacts and federal law to that effect; and

Be It Further Resolved, that the Board of Supervisors opposes efforts by any tribe to take land into trust or operate a casino unless it can demonstrate, to the satisfaction of the County of Sonoma, the State of California, and the Department of the Interior, compelling and significant historical ties to the specific designated property at issue and the right to exercise jurisdiction over that land.

Supervisors:

Gorin: Aye Rabbitt: Aye Coursey: Aye Hopkins: Aye Gore: Aye

Ayes: 5 Noes: 0 Absent: 0 Abstain: 0

So Ordered.

1568

ORIGIN ID:NOTA (707) 566-2288
FEDERATED INDIANS, GRATON RANCHERIA
FEDINDIANS OF GRATON RANCHERIA
6400 REDWOOD DRIVE
SUITE 300
ROHNERT PARK, CA 94028
UNITED STATES US

SHIP DATE: 12APR22
ACTWGT: 0.25 LB
CAD: 253882318/INET4460

BILL SENDER

EX®
xpress

TO THE HONORABLE DEBRA HAALAND
US DEPARTMENT OF THE INTERIOR
1849 C ST NW

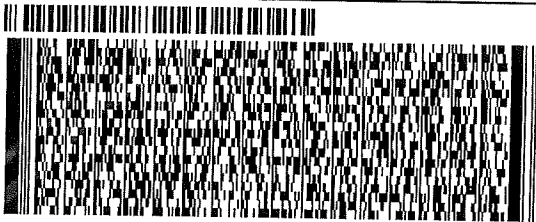
WASHINGTON DC 20240

(707) 566-2288
INV:
PO:

REF: TC

DEPT:

560J2/B0F9/FE4A



Extremely Urgent

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0182
04.13

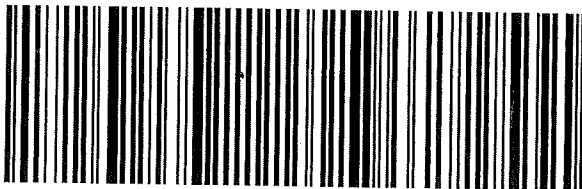
FedEx Ship Manager - Print Your Label(s)

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MORNING 2DAY

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0201

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20240
DC-US IAD



4/12/22, 2:01 PM

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Kashia Band of Pomo Indians
of the Stewarts Point Rancheria

April 14, 2022

RECEIVED

2022 APR 26 PM 12:55

OFFICE OF THE
EXECUTIVE SECRETARIAT

The Honorable Deb Haaland
Secretary,
U.S. Department of The Interior
Washington, D.C. 20420

Re: Opposition to Koi Nation's Application for Gaming Facility in Sonoma County

Dear Secretary Haaland:

On behalf of the Kashia Band of Pomo Indians of Stewarts Point Rancheria, I write to ask that you reject the Koi Nation's application to acquire 68 acres of land in trust for a casino in our aboriginal territory of Sonoma County.

We believe a Koi casino in Sonoma County would violate federal law and set an incredibly dangerous precedent. As you may know, Federal law requires that a restored tribe have a "significant historical connection" to the land on which it proposes to game (25 C.F.R. 292.12(b)). Department of Interior decisions make clear that "significant historical connection" requires a substantial showing of evidence that is specific to the applicant tribe, not based on evidence regarding a general language group. Moreover, the applicant tribe must show the existence of its ancestral villages, burial sites, subsistence or occupancy and use of the land. The transitory presence of individual tribal members during the 1900s and beyond is simply not enough. As people indigenous to Sonoma County, we know that the Koi Nation cannot meet this standard. Further, if the Koi Nation were to convince this Administration to break with such clear precedent, it would open all of Sonoma County up to casino projects proposed by tribes from many other parts of the State. The Sonoma County Board of Supervisors shares these grave concerns and joins us in our opposition to the Koi proposal. Please see attached County resolution.

Koi Nation has sited its proposed gaming land acquisition approximately 50 miles from its ancestral roots in the Lower Lake area of Lake County, near where the federal government acquired a rancheria for the tribe in 1916. In fact, the Koi Nation was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to the area. But the tribe changed its name in 2012 amid prior attempts to acquire a gaming site in the Bay Area: first near the Oakland International Airport, then on Mare Island in the City of Vallejo. The Koi Nation

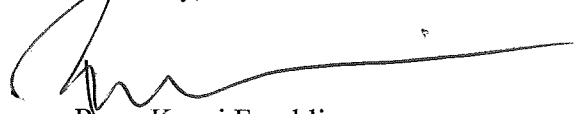
now is reviving its attempts to gain access to the Bay Area market through its most recent application.

Koi Nation's attempt to manufacture a connection to Sonoma County is an affront to Sonoma County tribes such as ours. Our people have an extensively documented presence here. Unlike the Koi Nation, the Tribe has distinct names and village sites within the County, our stories and traditions are tied to this cultural landscape, and our ancestors are buried here. Sonoma County is indigenous to the Southern and Southwestern Pomo language groups. In contrast, the Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here. We oppose any efforts by any tribes from outside the area to violate our ancestral territory. For us, this is not merely about gaming but about respecting boundaries and respecting our sovereignty and cultural resources.

We understand that Koi Nation does not have a reservation and accordingly we would support their efforts to establish a reservation in their true homeland in Lake County. Pushing through a proposal to jump into other tribes' territory, however, is wrong and ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game. Koi Nation's application is merely a cynical new twist on their past efforts to acquire gaming sites in Oakland and Vallejo.

Accordingly, we ask that you join us in supporting the Department's longstanding precedent of ensuring tribal governments can demonstrate a "significant historical connection," to the land on which it seeks to conduct gaming and oppose this inappropriate casino development project by the Koi Nation.

Sincerely,



Reno Keoni Franklin
Tribal Chairman

CC: Reno Franklin, Chairman, Kashia Band of Pomo Indians of the Stewards Point Rancheria
Vickey Macias, Tribal Treasurer, Cloverdale Rancheria of Pomo Indians
Margie Mejia, Chairwoman, Lytton Rancheria of California
Chris Wright, Chairman, Dry Creek Rancheria Band of Pomo Indians
Greg Sarris, Chairman, Federated Indians of Graton Rancheria

Enclosure (1)



**DRY CREEK RANCHERIA
BAND OF POMO INDIANS**

April 20, 2022

003425

RECEIVED

2022 APR 26 PM 12:52

OFFICE OF THE
EXECUTIVE SECRETARIAT

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Re: Koi Nation's Proposed Casino Project – Dry Creek's Opposition, Request for Consultation, and Notice of Conflict of Interest

Dear Secretary Haaland,

On behalf of the Dry Creek Rancheria Band of Pomo Indians, California ("Dry Creek"), I am writing to 1) express our opposition to a casino project proposed by the Koi Nation of Northern California ("Koi" or "Tribe"), 2) request consultation on the project, and 3) alert you to a potential conflict of interest within the Department of the Interior ("Interior") related to the project.

I. Dry Creek's Opposition and Request for Consultation

As you may be aware, on September 15, 2021, the Koi Nation submitted an application to Interior to have approximately 68 acres of land in unincorporated Sonoma County, California ("Sonoma County Site") taken into trust for gaming purposes. The proposed gaming facility would reportedly include 2,500 class III gaming machines, a 200-room hotel, six restaurants and food service areas, a meeting center, and a spa ("Koi Project" or "Project").

In pursuit of their efforts, it is Dry Creek's expectation that Koi intends to utilize the "restored lands" exception to the Indian Gaming Regulatory Act's ("IGRA") general prohibition on gaming on Indian lands. In 2019, the Koi Nation received a favorable judgment from the United States District Court for the District of Columbia which found that the Tribe satisfied one requirement of the "restored lands" exception—the federal government had "restored" the Tribe's federal recognition in 2000.¹ However, the Court's determination did not mean that Koi can now conduct gaming on *any* site it chooses—the Tribe must still demonstrate that it has a "significant historical connection" to any proposed gaming site.² The Koi Nation cannot establish such a connection to the Sonoma County Site.

A "significant historical connection" means "the land is located within the boundaries of the tribe's last reservation under a ratified or unratified treaty, or a tribe can demonstrate by historical documentation the existence of the tribe's villages, burial grounds, occupancy or subsistence use in the vicinity of the land."³ The Sonoma County Site is not within the boundaries of the Koi Nation's last reservation, nor can the Tribe demonstrate that its villages, burial grounds,

¹ *Koi Nation of Northern California v. U.S. Dep't of Interior*, 361 F. Supp. 3d 14, 46 (D.D.C. 2019).

² 25 C.F.R. § 292.12(b).

³ *Id.* at § 292.2.

Mailing Address: P.O. BOX 607, Geyserville, CA 95441

Rancheria Address: 3250 Highway 128 East, Geyserville, CA 95441

Office Address: 1450 Airport Boulevard, Suite 200A, Santa Rosa, CA 95403

occupancy, or subsistence use occurred in the vicinity of the Sonoma County Site. Dry Creek is confident in these assertions because the Sonoma County Site is actually within Dry Creek's aboriginal territory and there is no more knowledgeable expert on the occupancy and use of the Sonoma County Site lands than Dry Creek.

As Koi itself recognizes, its aboriginal territory is near Clear Lake, upwards of 50 miles northeast of the Sonoma County Site. In 1916, the federal government established a rancheria for the Tribe in Lake County, California near the Tribe's aboriginal territory. While the rancheria was sold pursuant to Congressional authorization in 1956, the rancheria is the Tribe's "last reservation" for purposes of the "restored lands" exception. It is Dry Creek's understanding that a municipal airport was planned for the site of the former rancheria when it was sold in 1956, but the airport was never built. Thus, there is no indication that existing development at the rancheria site stands as an obstacle to the Koi Nation's use of the former rancheria as a potential site for their proposed casino.

Because the Sonoma County Site is not within the boundaries of the former rancheria in Lake County, the Tribe cannot satisfy the "significant historical connection" requirement of the "restored lands" exception unless it has historical documentation of Koi's occupancy or use of the lands. But there is no historical documentation that would support such a claim. As mentioned above, the Sonoma County Site is within the boundaries of Dry Creek's aboriginal territory. We have historically occupied the Sonoma County Site lands and subsided on the resources found there. Contrary claims by Koi are false, cannot be supported by evidence, and will be challenged by Dry Creek and other Sonoma County tribes using all means necessary.

Dry Creek is concerned that Koi is reservation shopping—exploiting any minor connection to the Sonoma County Site because the Tribe is certain to make a larger profit from any gaming venture there than in Lake County near their aboriginal territory. We ask that Interior reject Koi's proposal which could set increasingly dangerous precedent for gaming tribes in California. When California voters authorized exclusive tribal class III gaming through propositions 5 and 1A in 1998 and 1999, they did so on the condition that tribal gaming would be limited to then-existing reservations. Every proposed casino that is outside of a tribe's reservation and/or a tribe's aboriginal territory does an about-face of the promises made to the voters. The California electorate has time and again rejected off-reservation gaming and Koi's Project is sure to be met with furious backlash from the local and state-wide community. Ultimately, Koi's Project threatens tribal exclusivity in the California gaming market, endangering the careful political balance that benefits of all California gaming tribes.

Dry Creek requests additional and continuing communications with Interior related to the Koi Project and, through this letter, requests formal consultation on the Project.

II. Assistant Secretary Newland Should Recuse Himself In Order to Avoid a Conflict of Interest

Additionally, through this letter, Dry Creek is assuming that Assistant Secretary – Indian Affairs Bryan Newland, has recused himself from any decisions related to the Koi Project. According to Interior's Departmental Ethics Office, Interior employees should recuse themselves "when a conflict of interest exists between an employee's job duties and financial interests (including interests in future employment) or certain business or personal relationships or outside activities." It is Dry Creek's understanding that Assistant Secretary Newland represented the Koi

Nation as a private attorney for many years while the Tribe pursued off-reservation gaming projects rather than looking to acquire the Tribe's former rancheria.

As the Chairman of Dry Creek, I have personally participated in calls with Koi where Bryan Newland also participated on behalf of Koi. It is clear that Assistant Secretary Newland should recuse himself from any decisions related to Koi's Project. Further, it should be considered whether Assistant Secretary Newland should be participating in any California off-reservation gaming decisions because of his representation of Koi and the clear stance the Tribe has taken on the proliferation of off-reservation gaming in California, with his prior support and representation.

III. Conclusion

Koi Nation's attempt to manufacture a connection to Sonoma County is an affront to Sonoma County tribes such as ours. Our people have an extensively documented presence here. Unlike the Koi Nation, the Tribe has distinct names and village sites within the County, our stories and traditions are tied to this cultural landscape, and our ancestors are buried here. Sonoma County is indigenous to the Southern and Southwestern Pomo language groups. In contrast, the Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here. We oppose any efforts by any tribes from outside the area to violate our ancestral territory. For us, this is not merely about gaming but about respecting boundaries and respecting our sovereignty and cultural resources.

We understand that Koi Nation does not have a reservation and accordingly we would support their efforts to establish a reservation in their true homeland in Lake County. Pushing through a proposal to jump into other tribes' territory, however, is wrong and ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game. Koi Nation's application is merely a cynical new twist on their past efforts to acquire gaming sites in Oakland and Vallejo.

Accordingly, we ask that you join us in supporting the Department's longstanding precedent of ensuring tribal governments can demonstrate a "significant historical connection," to the land on which it seeks to conduct gaming and oppose this inappropriate casino development project by the Koi Nation.

Please do not hesitate to contact me at (707) 888-2912 should you have any questions about this letter or Dry Creek's request for consultation.

Respectfully,



Chris Wright, Chairman
DRY CREEK RANCHERIA BAND OF POMO INDIANS

CC: Reno Franklin, Chairman, Kashia Band of Pomo Indians of the Stewards Point Rancheria
Vickey Macias, Tribal Treasurer, Cloverdale Rancheria of Pomo Indians
Margie Mejia, Chairwoman, Lytton Rancheria of California
Greg Sarris, Chairman, Federated Indians of Graton Rancheria



**Confederated Tribes of Siletz Indians
Tribal Council**

P.O. Box 549

Siletz, Oregon 97380

(541) 444-8203 • 1-800-922-1399 ext. 1203 • FAX: (541) 444-8325

May 17, 2022

Honorable Bryan Newland
Assistant Secretary of Indian Affairs
United States Department of Interior
1849 C Street N.W.
Washington, DC 20240

Subject: Support for Koi Nation of Northern California Land into Trust Acquisition, Sonoma County

Dear Assistant Secretary Newland:

The Confederated Tribes of Siletz Indians in Oregon wishes to offer its strong support for Koi Nation's land acquisition/restoration efforts in Sonoma County, California. As Tribal Chairman of Siletz, I understand the need for Koi Nation to establish a home territory in order to further the Nation's self-determination, self-governance, economic development and cultural preservation.

We understand the long federal process for taking land into trust and wish Koi Nation great success in meeting all of the federal requirements for ensuring the casino project they plan in Sonoma County is safe for the environment and beneficial to the Nation. Land restoration is very important to the Koi Nation as it is for all tribes who were once landless or saw their territory diminished. Koi Nation also experienced a long period of being treated as a terminated tribe which cost the Nation decades of lost opportunities. Now is the time for the Bureau of Indian Affairs to partially rectify this tragic history and acquire land in trust for Koi Nation.

Sincerely,


Delores Pigsley
Tribal Chairman

Cc: Paula Hart, Director Office of Indian Gaming
Koi Nation Council



June 14, 2022

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Request for Public Hearing on Scoping & Extension of Comment Deadline for the Koi Casino Proposal

Dear Ms. Dutschke and Mr. Broussard,

On behalf of the Federated Indians of Graton Rancheria (the Tribe), I submit this request for a public scoping hearing and a 30-day extension to submit comments on the Koi gaming proposal located just outside Windsor, California. On May 27, the Bureau of Indian Affairs (BIA) published its notice of preparation of an Environmental Assessment (EA) / Tribal Environmental Impact Report (TEIR), providing a June 27 deadline to submit comments on the appropriate scope of environmental issues to be considered. We request that deadline be extended until July 27 given the scale and complexities of this project and the need for a public scoping hearing. We further request that the project be subject to a full Environmental Impact Statement (EIS), not an EA, and that BIA issue its Indian Gaming Regulatory Act (IGRA) determination prior to moving forward with the environmental process.

As you know, the proposal involves the development of a large Class III gaming facility—including a “casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure”—in an environmentally sensitive area demonstrably prone to wildfire. The proposed project is also outside the Koi Nation’s ancestral territory. Unsurprisingly, the project is opposed by all of the Sonoma County tribes and the local jurisdictions of Sonoma County and the Town of Windsor. See, for example, the attached County and Town resolutions. A large-scale project such as this should be comprehensively analyzed in a full EIS. An EA would not satisfy the National Environmental Policy Act’s legal

standards or commitment to thorough, fact-based decisionmaking and robust public involvement. It would be helpful to have a more open dialogue with the BIA through a public scoping hearing so that the public may better understand the BIA's preference for an EA, as well as the BIA's unusual decision to fold in a Tribal Environmental Impact Statement under State law prior to the existence of a State compact or any local intergovernmental agreements.

Last, as a matter of agency procedure and efficiency of federal resources, BIA should first conduct a restored lands determination under IGRA before proceeding with the environmental review process. If the Shiloh Road parcel does not qualify as the Koi's "restored lands," a casino cannot be built and there is no point in conducting a lengthy and expensive environmental review of the casino project. The Koi Nation is deeply rooted to the Lower Lake region in Lake County and cannot demonstrate a significant historical connection to this parcel or to Sonoma County, generally.

We respect the tribal sovereignty of the Koi Nation and support them in pursuing tribal self-determination and economic development within their ancestral homelands in Southeastern Pomo territory. However, we are deeply concerned with the Koi Nation's claim that it is historical connected to the lands of the Southern and Southwestern Pomo and with the agency review process as it is currently framed. Thank you for hearing our concerns and considering our requests. We look forward to working with the Department on this issue.

Sincerely,


Greg Sarris
Chairman

Enclosures (2)



County of Sonoma

State of California

THE WITHIN INSTRUMENT IS A
CORRECT COPY OF THE ORIGINAL
ON FILE IN THIS OFFICE

ATTEST: April 5, 2022
SHERYL BRATTON, Clerk/Secretary
BY *Noelle Francis*

Date: April 5, 2022

Item Number: 13

Resolution Number: 22-0121

☐ 4/5 Vote Required

**Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California,
Opposing the Establishment of a Casino By The Koi Nation, a Non-Sonoma County Tribe,
Within the County**

Whereas, the Sonoma County Board of Supervisors has consistently opposed the establishment of Nevada-style casino gaming in Sonoma County;

Whereas, within the geographic boundaries of the County of Sonoma, lies the historic and ancestral territory of five federally recognized Southern and Southwestern Pomo tribes: the Cloverdale Rancheria of Pomo Indians; the Dry Creek Rancheria Band of Pomo Indians; the Federated Indians of the Graton Rancheria, the Kashia Band of Pomo Indians of the Stewarts Point Reservation; and the Lytton Rancheria Band of Pomo Indians;

Whereas, within the geographic boundaries of Lake County, lies the historic and ancestral territory of seven federally recognized Southeastern Pomo tribes: Elem Indian Colony; Habematolel Pomo of Upper Lake; Big Valley Band of Pomo Indians; Scotts Valley Band of Pomo Indians; Robinson Rancheria; Koi Nation of Northern California (Lower Lake Rancheria); and Middletown Rancheria of Pomo Indians of California;

Whereas, in the 1950s and 1960s the federal government passed a series of laws including the California Rancheria Termination Acts, which among other things ended the federal government's relationship with, recognition of, and benefits to numerous tribes in California, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, several tribes have been restored to federal recognition through legislation or litigation, including the Cloverdale Rancheria, Graton Rancheria, and Lytton Rancheria in Sonoma County, and most recently the Lower Lake Rancheria (Koi Nation) in Lake County;

Whereas, around 2005, after changing its name, the Koi Nation unsuccessfully sought to acquire a site for a Las Vegas-style casino outside of Lake County, near the Oakland International Airport; and in 2014 the Koi Nation unsuccessful sought to establish a reservation and casino on Mare Island in the City of Vallejo;

Whereas, in 2019, the United States District Court for the District of Columbia, issued a decision declaring that the Koi Nation, as a reaffirmed tribe, was an Indian tribe restored to federal recognition; see *The Koi Nation of Northern California v. United States Dept. of the Interior* (D.C. Dist. Ct, Jan. 2019) 361 F. Supp. 3d 14;

Whereas, in September 2021, the Koi Nation, through its LLC, Sonoma Rose, purchased a ± 68.60 acre parcel (Subject Land), located at 222 E. Shiloh Road, on the southeast corner of the intersection of Shiloh Road and Old Redwood Highway, in the unincorporated area of the County;

Whereas, Shiloh Ranch Regional Park is to the east, residential development is north and south, the Town of Windsor is to the north and northwest, and the Sonoma County Airport is to the southwest of the Subject Land which is largely agricultural;

Whereas, in September 2021, the Koi Nation submitted an application to the federal government requesting that the United States Department of the Interior accept the Subject Land into trust for casino gaming and resort purposes under Part 151 of Title 25 of the Federal Code of Regulations;

Whereas, Federal law requires that a tribe restored to federal recognition have a “significant historical connection” to the land on which it proposes to game, 25 C.F.R. 292.12(b);

Whereas, the Koi Nation intends to operate its own gaming facility on the Subject Lands

to the exclusion of Sonoma County tribes;

Whereas, the Board of Supervisors strongly opposes tribes from outside Sonoma County attempting to use their tribal status to place lands within the County in trust and/or to otherwise establish gaming operations within the County;

Whereas, the Board of Supervisors strongly opposes tribes that do not have a clear significant historical connection to a specific property, or do not have authority to exercise jurisdiction in Sonoma County, from taking such property into trust or using such trust property for gaming purposes;

Whereas, the Board of Supervisors continues to encourage Sonoma County tribes to establish boundaries to assist in the determination of trust applications and other tribal issues;

Whereas, the five federally recognized Sonoma County based tribes (Cloverdale Rancheria, Dry Creek Rancheria, Lytton Rancheria, Stewart's Point Rancheria, and the Federated Indians of the Graton Rancheria) each sent the Board of Supervisors a letter or tribal resolution expressing unanimous opposition to the Koi Nation's proposal that the Department of the Interior to accept the Subject Land into trust for gaming purposes due to the Koi Nation's lack of significant historical connection to the Subject Land;

Whereas, gaming projects have significant environmental impacts and other effects on a community, particularly in an area that is predominantly agricultural and residential; and the County's infrastructure may not be able to adequately accommodate the proposed facility and its accompanying traffic, water, wastewater or other impacts;

Whereas, the Board of Supervisors respects tribal sovereignty and takes seriously its government-to-government relationship with tribes, and has worked in good faith with Sonoma County tribes towards a variety of shared goals, including the mitigation of off-reservation impacts stemming from on-reservation development;

Whereas, the Board of Supervisors supports and joins with Sonoma County tribes in opposing the Koi Nation's efforts at obtaining trust lands and establishing a resort

casino in Sonoma County; and

Whereas, allowing a tribe without a significant historical connection to the Subject Land, the area in the vicinity of the Subject Land, or the County of Sonoma generally, sets a significant negative regional precedent:

Now, Therefore, Be It Resolved, that the Board of Supervisors opposes any tribe attempting to establish trust property, exercise jurisdiction, or establish a gaming facility within the historical territory of other tribes without those tribes' explicit permission and partnership and supports an interpretation by the Governor of California, National Indian Gaming Commission, Bureau of Indian Affairs, and Department of the Interior of existing compacts and federal law to that effect; and

Be It Further Resolved, that the Board of Supervisors opposes efforts by any tribe to take land into trust or operate a casino unless it can demonstrate, to the satisfaction of the County of Sonoma, the State of California, and the Department of the Interior, compelling and significant historical ties to the specific designated property at issue and the right to exercise jurisdiction over that land.

Supervisors:

Gorin: Aye

Rabbitt: Aye

Coursey: Aye

Hopkins: Aye

Gore: Aye

Ayes: 5

Noes: 0

Absent: 0

Abstain: 0

So Ordered.

RESOLUTION NO. 3743-22

**A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF WINDSOR
IN SUPPORT OF RETAINING THE EXISTING SONOMA COUNTY GENERAL PLAN
LAND USE DESIGNATION OF LAND INTENSIVE AGRICULTURE FOR THE
PROPERTY LOCATED AT 222 E. SHILOH ROAD, ALSO IDENTIFIED AS
ASSESSOR'S PARCEL NUMBER 059-300-003**

WHEREAS, in September 2021, an application was submitted by a federally recognized tribe, the Koi Nation (formerly Lower Lake Rancheria), to the federal government requesting that the United States Department of the Interior accept a 68-acre parcel in unincorporated Sonoma County located at 222 E. Shiloh Road (Project Site) into trust for casino gaming and resort purposes under Part 151 of Title 25 of the Federal Code of Regulations; and

WHEREAS, while the Project Site is not within the Town of Windsor, the Town boundary is immediately adjacent to the north, the property to the west is within the Town's sphere of influence, and the Project Site is primarily accessed by Shiloh Road and Old Redwood Highway, portions of which are located wholly within the Town of Windsor; and

WHEREAS, the Sonoma County General Plan land use designation for the Project Site is Land Intensive Agriculture, the purpose of which is "to enhance and protect lands best suited for permanent agricultural use and capable of relatively high production per acre of land"; and

WHEREAS, the Project Site is within the Windsor/Larkfield/Santa Rosa Community Separator, the purpose of which is to maintain a greenbelt between the more densely developed areas of Sonoma County; and

WHEREAS, properties adjacent to the Project Site have been designated for Very Low Density Residential and Boulevard Mixed Use land uses in the Town of Windsor General Plan; and

WHEREAS, the Project Site is at the eastern boundary of the Shiloh Road Vision Plan, which envisions development of the corridor in such a way as to promote walking and biking; and

WHEREAS, the planning for the density and intensity of these land use designations and for Town infrastructure in the area was done with the assumption that the Project Site would continue to be used for agriculture; and

WHEREAS, in February 2022, the County of Sonoma Board of Supervisors received letters or tribal resolutions from the five federally recognized Sonoma County based tribes (Cloverdale Rancheria, Dry Creek Rancheria, Lytton Rancheria, Stewart's Point Rancheria, and the Federated Indians of the Graton Rancheria) expressing unanimous opposition to the Koi Nation's proposal that the Department of the Interior to accept the Project Site into trust for gaming purposes due to the Koi Nation's lack of significant historical connection to the Project Site; and

WHEREAS, on April 5, 2022, the Board of Supervisors of the County of Sonoma unanimously voted to adopt a resolution opposing the establishment of a casino by the Koi Nation within the County.

NOW, THEREFORE BE IT RESOLVED that the Town Council of the Town of Windsor supports retaining the existing Sonoma County General Plan land use designation of Land Intensive Agriculture for the property located at 222 E. Shiloh Road; and

BE IT FURTHER RESOLVED that we, the Town Council of the Town of Windsor, support the continued use of the land for agricultural purposes; and

BE IT FURTHER RESOLVED that we, the Town Council of the Town of Windsor, support the Board of Supervisors of the County of Sonoma in opposing the establishment of a casino on the project site.


PASSED, APPROVED, AND ADOPTED this 20th day of April 2022, by the following vote:

AYES: COUNCILMEMBERS FUDGE, REYNOZA, VICE MAYOR LEMUS
AND MAYOR SALMON

NOES: NONE

ABSTAIN: NONE

ABSENT: NONE



SAM SALMON, MAYOR

ATTEST:



IRENE CAMACHO-WERBY, TOWN CLERK



Cloverdale Rancheria

555 S. Cloverdale Blvd. ~ Cloverdale, CA 95425
(707) 894-5775 ~ Fax (707) 894-5727

June 22, 2022

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re Request for Public Hearing on Scoping an Extension of Comment Deadline
for the Koi Casino Proposal

Dear Ms. Dutschke and Mr. Broussard,

On behalf of the Cloverdale Rancheria (the Tribe), we submit this request for a public scoping hearing and a thirty-day extension to submit comments on the Koi gaming proposal located just outside Windsor, California. On May 27th, The Bureau of Indian Affairs (BIA) published its notice of preparation of an Environmental Assessment (EA) / Tribal Environmental Impact Report (TEIR), providing a June 27th deadline to submit comments on the appropriate scope of environmental issues to be considered. We ask that the deadline be extended at least until July 27th due to the scale and complexities of this project, and the need for a public scoping hearing. We further request that the project undergo a full Environmental Impact Statement (EIS), not an EA, and that the BIA issue its Indian Gaming Regulatory Act (IGRA) determination prior to moving forward with the environmental process. There will be no point in going through the fee to trust process if land is not eligible for its intended use under the IGRA.

The proposal here involves the development of a large Class III gaming facility—including a “casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure”—in an environmentally sensitive area that is at risk for wildfires. The proposed project is also outside the Koi Nation’s ancestral territory. The project is opposed by all the Sonoma County tribes and the local jurisdictions of Sonoma County and the Town of Windsor. This large-scale project, with much controversy, should be comprehensively analyzed in a full EIS. An EA would not satisfy the National Environmental Policy Act’s legal standards or commitment to thorough, fact-based decision making and robust public involvement. We seek to have a more open dialogue with the BIA through a public scoping hearing so that the public may better

CLOVERDALE RANCHERIA TRIBAL COUNCIL

Patricia Hermosillo
Chairperson

Silver Galletto
Vice-Chairperson

Maria Elliott
Secretary

Vickey Macias
Treasurer

Sandy Roope
Tribal Representative



Cloverdale Rancheria

understand why the BIA prefers an EA, as well as the BIA's atypical decision to fold in a Tribal Environmental Impact Statement under State law prior to the existence of a State compact or any local intergovernmental agreements.

Last, as a matter of agency procedure and efficiency of federal resources, the BIA should first conduct a restored lands determination under the IGRA before proceeding with the environmental review process. If the Shiloh Road parcel does not qualify as the Koi's "restored lands," a casino cannot be built and there is not point in conducting a lengthy and expensive environmental review of the casino project. The Koi Nation is deeply rooted to the Lower Lake region in Lake County and cannot demonstrate a significant connection to this parcel or to Sonoma County, generally.

We respect the tribal sovereignty of the Koi Nation and support them in pursuing tribal self-determination and economic development within their ancestral homelands in Southeastern Pomo territory. However, we are deeply concerned with the Koi Nation's claim of being historically connected to the lands of the Southern and Southwestern Pomo. Furthermore, we have objections to the proposed agency review process as it is currently framed.

Thank you for hearing our concerns and considering our requests. We look forward to working with the Department on this issue.

Sincerely,

Patricia Hermosillo
Tribal Chairperson

CLOVERDALE RANCHERIA TRIBAL COUNCIL

Patricia Hermosillo
Chairperson

Silver Galletto
Vice-Chairperson

Maria Elliott
Secretary

Vickey Macias
Treasurer

Sandy Roope
Tribal Representative



**DRY CREEK RANCHERIA
BAND OF POMO INDIANS**

VIA ELECTRONIC SUBMISSION: chad.broussard@bia.gov

Amy Dutschke, Regional Director
C/O Chad Broussard
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

*Re: Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact
Report: Koi Nation Shiloh Resort and Casino Project*

Dear Director Dutschke:

On behalf of the Dry Creek Rancheria, Band of Pomo Indians, a federally recognized Indian tribe (the “Tribe”), this comment is submitted in response to the above referenced Notice of Preparation (“NOP”).

I. INTRODUCTION

I. Dry Creek’s Opposition and Request for Consultation

On September 15, 2021, the Koi Nation submitted an application to Interior to have approximately 68 acres of land in unincorporated Sonoma County, California (“Sonoma County Site”) taken into trust for gaming purposes. The proposed gaming facility would reportedly include 2,500 class III gaming machines, a 200-room hotel, six restaurants and food service areas, a meeting center, a spa and supporting parking and infrastructure (“Koi Project” or “Project”).

Based on the NOP, Koi intends to utilize the “restored lands” exception to the Indian Gaming Regulatory Act’s (“IGRA”) general prohibition on gaming on Indian lands. In 2019, the Koi Nation received a favorable judgment from the United States District Court for the District of Columbia which found that the Tribe satisfied one requirement of the “restored lands” exception—the federal government had “restored” the Tribe’s federal recognition in 2000. *Koi Nation of Northern California v. U.S. Dep’t of Interior*, 361 F. Supp. 3d 14, 46 (D.D.C. 2019). However, the Court’s determination does not mean that Koi can now conduct gaming on *any* site it chooses—the Tribe must still demonstrate that it has a “significant historical connection” to any proposed gaming site. 25 C.F.R. § 292.12(b). Unfortunately, the Koi Nation cannot establish such a connection to the Sonoma County Site because the proposed site is outside of the traditional homelands of the Koi Nation.

A “significant historical connection” means “the land is located within the boundaries of the tribe's last reservation under a ratified or unratified treaty, or a tribe can demonstrate by

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historical documentation the existence of the tribe's villages, burial grounds, occupancy or subsistence use in the vicinity of the land.” *Id.* at § 292.2. The Sonoma County Site is not within the boundaries of the Koi Nation’s last reservation, nor can the Tribe demonstrate that its villages, burial grounds, occupancy, or subsistence use occurred in the vicinity of the Sonoma County Site. Dry Creek is confident in these assertions because the Sonoma County Site is actually within Dry Creek’s aboriginal territory (as well as other Sonoma County tribes) and there is no more knowledgeable expert on the occupancy and use of the Sonoma County Site lands than Dry Creek.

As Koi itself recognizes, its aboriginal territory is near Clear Lake, upwards of 50 miles northeast of the Sonoma County Site. In 1916, the federal government established a rancheria for the Tribe in Lake County, California near the Tribe’s aboriginal territory. While the rancheria was sold pursuant to Congressional authorization in 1956, the rancheria is the Tribe’s “last reservation” for purposes of the “restored lands” exception. In fact, despite claims by Koi that the Tribe never used the original rancheria in its request for restored lands to the Office of Indian Gaming, Congress “gave the remaining 40 acres in fee simple to Harry Johnson, *a tribal member who had continuously used the land.*”¹

Koi’s letter dated September 13, 2021, to Paula Hart regarding a request for restored lands opinion states that that the “Tribe was pushed from our homelands by the United States to make way for settlement and development by outsiders”, however, tribal members were living on the former rancheria when Congress terminated the tribe. The Lower Lake Rancheria is the Tribes ancestral home, there is no doubt about that fact. Even the Koi Nation themselves assert this in the area of cultural resource protection matters. But they have created a convenient narrative that they all “had” to move to the Santa Rosa area because of the termination of the Rancheria. Their own documents do not support this narrative because a relatively small percentage of their small membership (15%) lives in the Santa Rosa area. If the federal government will use such arbitrary reasons to establish a “historical connection” to lands, then many Northern California tribes could make the argument to move their rancherias to the Bay Area or Sacramento. It is a ruse.

It is Dry Creek’s understanding that a municipal airport was planned for the site of the former rancheria when it was sold in 1956, but the airport was never built. Thus, there is no indication that existing development at the rancheria site stands as an obstacle to the Koi Nation’s use of the former rancheria as a potential site for their proposed casino. The fact that the Tribe now does not *want* that land should not be the basis for the Koi Nation to be able to select its new home in the lands that are aboriginal to *other* tribes.

Because the Sonoma County Site is not within the boundaries of the former rancheria in Lake County, the Tribe cannot satisfy the “significant historical connection” requirement of the “restored lands” exception unless it has historical documentation of Koi’s occupancy or use of the lands. But there is no historical documentation that would support such a claim. As mentioned above, the Sonoma County Site is within the boundaries of Dry Creek’s aboriginal territory. We have historically occupied the Sonoma County Site lands and subsided on the resources found there. Contrary claims by Koi are false and cannot be supported by evidence.

¹ In Re: The June 13, 2008, disapproval of a gaming ordinance for the Lower Lake Rancheria Koi Nation, Final Decision and Order, October 7, 2008 at page 3.

Dry Creek is concerned that Koi is reservation shopping—exploiting any minor connection to the Sonoma County Site because the Tribe is certain to make a larger profit off of any gaming venture there than in Lake County near their aboriginal territory. We ask that Interior reject Koi's proposal which could set increasingly dangerous precedent for gaming tribes in California. When California voters authorized exclusive tribal class III gaming through propositions 5 and 1A in 1998 and 1999, they did so on the condition that tribal gaming would be limited to then-existing reservations. Every proposed casino that is outside of a tribe's reservation and/or a tribe's aboriginal territory does an about-face of the promises made to the voters. The California electorate has repeatedly rejected off-reservation gaming and Koi's Project is sure to be met with furious backlash from the local and state-wide community. Ultimately, Koi's Project threatens tribal exclusivity in the California gaming market, endangering the continuing prosperity of all California gaming tribes.

Dry Creek welcomes additional and continuing communications with Interior related to the Koi Project and, through this letter, requests formal consultation on the Project.

II. Comments on the EA/TEIR- An Environmental Assessment is Not Adequate.

The Project proposes an action with two parts: (1) the acquisition by the federal government of approximately 86 acres of land in Santa Rosa, California (the "Shiloh parcel") in trust for the benefit of the Lower Lake Koi Nation as restored lands, and (2) establish its economic lands base in order to promote the general welfare of the Koi Nation and its members, raise governmental revenues, and create jobs for its members.

We believe that the Environmental Assessment will be deficient because the BIA failed to examine and analyze reasonable alternatives to the Project by determining that an EIS is not required for a massive project such as this, which is proposed in an area with existing traffic congestion and in conflict with surrounding land uses. Moreover, this Project application's environmental review process has moved faster than most other similar projects have in the past, which is extremely concerning to Dry Creek, because the scoping is taking place during a worldwide pandemic that has severely impacted our Tribe's ability to allocate resources to tracking the process and properly evaluating the impacts that the project will have on our Tribe, as well as the surrounding community. Moreover, even the BIA offices are not currently open and most BIA staff in Sacramento are teleworking. We cannot emphasize the importance of this deficiency at this time.

Additionally, the Project would be detrimental to Dry Creek, as Dry Creek's governmental functions and/or services will be directly, immediately and significantly impacted by the proposed gaming establishment and the EA will did not explore adequate non-gaming alternatives. As such, the Secretary should deny the acquisitions of such lands into trust for gaming under 25 U.S.C. § 2719 (b)(1)(B)(iii). In fact, even the NOP is deficient because it does not state the basis for the project to be approved, which is under the provisions of 25 U.S.C. § 2719 (b)(1)(B)(iii), not just 25 U.S.C. § 5108.

Before getting into the substantive areas of the NOP, we wish to note that the Dry Creek Rancheria, Band of Pomo Indians was not provided with a copy of the NOP, but we were informed

about it by a 3rd party consultant who found it online without giving us an appropriate amount of time to prepare this letter.

The balance of this letter is to provide input about our concerns regarding the environmental impacts to our homelands that will result from this project.

Scope of the EA and Potential Environmental Effects

Land Resources/Geology and Soils – The NOP wrongly refers this topic to building codes and earthquake safety standards, however, the topic of land resources, geology and soils requires an examination that is much broader than proposed. We assume that the fact that only an EA is being contemplated for a massive casino project in an urban setting such as this unheard of and this brief description of the land resources, geology and soils.

Water—Sonoma County is currently facing dramatic water shortages that are drought-related, but also systemic. As our tribe faces curtailment orders (along with other Alexander Valley vineyards) it is vital that the basin be protected from overdraft of the water table. We do not believe that the NOP adequately outlines the need to identify off-site water supplies to support the project.

Air Quality/Greenhouse Gases – The Proposed Project has the potential to cause increased air emissions within the area. Additional greenhouse gases (GHG) will be emitted. The Project could contribute to a cumulative impact to impaired air quality, as the Shiloh site is located in a non-attainment area subject to significant traffic congestion. An EA will not specifically address the potential cumulative health impacts that occur from combined Project emissions and increased traffic emissions from roadways and the nearby freeway, and other industrial uses in the vicinity. A more detailed examination of the potential for cumulatively significant air impacts in the region is needed to make an informed decision regarding the proposed project. We believe the NOP must be withdrawn as written because the proposed study is insufficient.

Biological Resources—The NOP wrongly asserts that “Construction activities forth the Proposed Project would be on land that has already been disturbed with prior grading and development and is surrounded on all sides by development and agriculture” as a basis that impacts to biological resources would be minimal. However, in the next sentence, the NOP identifies Pruitt Creek, which bisects the site, is “designated as critical habitat (pursuant to the federal Endangered Species Act), designated as essential fish habitat (pursuant to the Magnuson-Stevens Fishery Conservation and Management Act), and provides potential habitat for several federally listed salmonids”. It appears that the NOP is an indication of the low level of scrutiny that will be given to these important biological resources in the EA. It is also clear, merely from the aerial photo, that the “development” of the land is limited to a small proportion of the parcel and that the parcel is primarily used for agricultural purposes, which is a low-density and minimal impact use that is consistent with the region.

It is important to note that the fact that an NPDES permit is necessary for the Proposed Project, which will discharge into critical habitat, should give rise to the need for an EIS for the Proposed Project. The failure to require an EIS indicates a lack of diligence on the part of the BIA for this undertaking.

Cultural Resources – Despite the fact that the Shiloh site is has been previously impacted by some development, it is nonetheless within the aboriginal territory of the Dry Creek Mihilakawna and Makahmo Pomo people, as well as neighboring Sonoma County tribes. The site may contain tribal cultural resources important to the Dry Creek people. The fact that a lithic scatter occurs within ¼ mile from the site and the Pruitt Creek bisects the site gives rise to significant concern that tribal cultural resources that are culturally affiliated with our Tribe will be impacted by the Proposed Project. Preparation of an EIS would allow for a scoping process that would allow us to gain more information in order to properly assess the potential impact of the Proposed Project on our tribal cultural resources.

Socioeconomics/Environmental Justice—The NOP focuses on the fact that the Lower Lake Koi Nation owns the one home that is on the site, however the Tribe has only owned the property for a brief period of time. The area could have been the site for future homes, particularly since the area is facing a critical housing crisis since several fires severely impacted the already limited housing that is available to families in Sonoma County. Ultimately, the Dry Creek Rancheria is a tribe with a significant tribal population in Sonoma County (as are the other six Sonoma County tribes). Our tribal members are in desperate need of housing and this Proposed Project will only hurt our tribal member families. An EIS is the appropriate level of study for this reason.

Transportation and Circulation – The NOP has one sentence regarding the study of impacts to the already significantly impacted highway 101 area. There is no sound reason to limit the scope of evaluation of impacts to traffic to an EA and still comport with the guidance on NEPA.

Land Use – The NOP wrongly asserts that because the project will be built on the site that there will not be any off-reservation land use plan, policy, habitat conservation plan or natural community conservation plan that would apply to the Proposed Project. If there are site specific impacts that require off-site mitigation, then there most certainly would be off-reservation mitigation plans required. One could wonder how such an improper statement could be made in an NOP for such a project. Moreover, because the document is a joint EA/TEIR, which would, for purposes of any tribal-state compact, require a study and mitigation of off-reservation impacts, the document should be looking at such mitigation.

Public Services—The NOP is in error with the assumption that existing and proposed on-site wells will provide sufficient water for the Proposed Project. We do not believe that there is sufficient water for the needs of the Project, but a scoping process for an EIS would better focus on that issue to ensure that adequate water is available. Moreover, the impact on public services including fire and police protection requires a greater level of detail because of the impacts on the ability of Sonoma County to provide such services to our tribal members who live in the area. An EIS is the appropriate document for that level of study.

Noise, Hazardous Matter and Aesthetics—As with all of the comments above, these particular impacts will be significant and drastically change the environment surrounding the Proposed Project. An EIS is the appropriate document for that level of study.

II. CONCLUSION

The Tribe appreciates the opportunity to submit this public comment and looks forward to meeting with the BIA to address our concerns. In the spirit of that commitment, we request a meeting with BIA to discuss our concerns since we were not given the opportunity to participate in a public scoping meeting for a more appropriate EIS. Thank you for considering our comments. If you have any questions about this letter, please contact Michelle LaPena, at michelle@thecirclelaw.com or (916) 809-8900.

Sincerely,

A handwritten signature in black ink, appearing to read "CWright", with a horizontal line extending from the end of the signature.

Chris Wright, Chairman

DRY CREEK RANCHERIA BAND OF POMO INDIANS



June 27, 2022

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Graton Rancheria Scoping Comments on the Koi Casino Proposal

Dear Ms. Dutschke and Mr. Broussard,

On behalf of the Federated Indians of Graton Rancheria (FIGR or the Tribe), I submit these comments on the Koi fee-to-trust application for a gaming project just outside Windsor, California. On May 27, the Bureau of Indian Affairs (BIA) published its Notice of Preparation (NOP) of an Environmental Assessment (EA) / Tribal Environmental Impact Report (TEIR), providing a June 27 deadline to submit comments on the appropriate scope of environmental issues to be considered.¹ Due to the scale of this project and fundamental agency process concerns, by letter dated June 14 we requested a public scoping hearing and that the deadline be extended 30 days. The BIA denied our request via email on June 24, citing the interest of efficiency and noting that the National Environmental Policy Act (NEPA) does not require a Notice of Preparation or scoping period at this stage of the process. While we respectfully disagree with your decision, as detailed below, we nonetheless provide substantive scoping comments to assist your agency.

¹ BIA, Notice of Preparation of an Environmental Assessment / Tribal Environmental Impact Report, *available at* <https://www.shilohresortenvironmental.com/> (hereinafter referred to as the NOP).

I. The BIA Should Proceed with an Environmental Impact Statement (EIS)

We start by identifying serious procedural concerns that should be addressed prior to moving forward with the NEPA process. The NOP describes the Koi Nation's application to transfer into trust a 68.6-acre parcel at 222 E. Shiloh Road (the Property) for the purpose of constructing a "casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure," including a wastewater treatment plant.² The Koi Nation's website provides more detail, stating that "[t]he project will include a 2,500 Class III gaming machine facility, a 200-room hotel, six restaurant and food service areas, a meeting center and a spa," and the Koi Nation's spokesperson indicated the project will be 1.2 million square feet.³ Given the project's size and location in an environmentally sensitive area along a wildfire corridor, there are bound to be short and long-term effects that implicate numerous environmental issues and public safety.⁴ A project of this scale warrants a full Environmental Impact Statement (EIS) and BIA's practice has long been to conduct the more comprehensive review demanded by an EIS for tribal gaming projects of this nature.⁵ BIA has not offered an explanation for why it believes an EA is appropriate in this context.⁶

A public scoping hearing would have been an opportunity for the BIA to explain to the public and impacted tribal sovereigns, such as our own, the rationale for treating this tribal gaming project differently. In fact, our own casino resort project—also a Class III gaming facility of similar size and scope—underwent public and local jurisdiction scoping hearings to

² NOP at 3.

³ Koi Nation, "Shiloh Resort & Casino," <https://www.koinationsonoma.com/project/> (last visited June 24, 2022); See Paul Bomberger, *Koi Indian tribe unveils plans for \$600 million casino resort in Sonoma County*, THE PRESS DEMOCRAT, Sept. 15, 2021.

⁴ See 40. C.F.R. § 1501.3(b).

⁵ See, e.g., BIA, Final Environmental Impact Statement, Tejon Indian Tribe Trust Acquisition and Casino Project (Oct. 2020) (hereinafter 2020 Tejon FEIS) (evaluating trust acquisition of 306 acres of land for 715,800 ft² Class III gaming facility with casino, restaurants, entertainment and retail space, a fire and police station, RV park, water treatment facilities, and 400-room hotel); BIA, Final Environmental Impact Statement, Tule River Indian Tribe Fee-to-Trust and Eagle Mountain Casino Relocation Project (Apr. 2019) (hereinafter 2019 Tule River FEIS) (evaluating trust acquisition of 40 acres of land for 452,465 ft² Class III gaming facility with casino, food and beverage facilities, events center, conference center, parking and 250-room hotel); BIA, Final Environmental Impact Statement / Tribal Project Environmental Document, Wilton Rancheria Fee-to-Trust and Casino Project (Dec. 2016) (hereinafter 2016 Wilton FEIS) (evaluating trust acquisition of 35.92 acres of land for 608,756 ft² Class III gaming facility with casino, restaurants, convention center, and 302-room hotel); BIA, Final Environmental Impact Statement, Soboba Band of Luiseño Indians Horseshoe Grande Fee-to-Trust Project (Sept. 2013) (hereinafter 2013 Soboba FEIS) (evaluating trust acquisition of 55 acres of land for 729,500 ft² Class III gaming facility with casino, restaurants, retail, a convention center, events arena, and 300-room hotel, as well as two fire stations and gas station).

⁶ Relatedly, to our knowledge, it is not typical for the BIA to prepare a TEIR, under State law, alongside its federally required environmental analysis, prior to the existence of a State compact or local governmental agreements. Moreover, the BIA generally has no involvement with a TEIR as the tribe is the lead agency and State and local agencies would be involved. The NOP is unclear how the TEIR would be structured and who would serve as the lead agency.

support the preparation of a full EIS.⁷ Yet in this case, the BIA determined not to conduct a scoping hearing, implying that because a public scoping period is not required for an EA, the BIA was already exceeding its procedural obligations by allowing for scoping comments.⁸ The irony, of course, is that if the BIA *were* properly proceeding with this project under an EIS, then a public scoping period *would* be required and BIA's practice has long been to hold a public hearing or meeting during scoping when preparing EISs for these types of projects.⁹ In any event, we once again urge you to evaluate this project pursuant to an EIS, rather than an EA.

II. The BIA Should Issue Its IGRA Determination Prior to Proceeding with NEPA

We also reiterate our position that BIA should first conduct a restored lands determination under IGRA before it continues with environmental review. The Koi Nation offers novel arguments to support its purported significant historical connection¹⁰ to the Shiloh Parcel. These arguments, anchored on the 20th century relocation of certain Koi families from the Nation's ancestral homelands in Lower Lake, California, to Sebastopol and Santa Rosa in Sonoma County, go far beyond the bounds of existing Departmental precedent. The Department has already determined that "relocation of some of [a tribe's] members to various locales throughout the Bay Area does not equate to the [tribe] itself establishing subsistence use or occupancy in the region apart from its Rancheria"¹¹ and that "evidence of the [tribe's] citizens' movements as late as the 1960s is more of a *modern* era activity, as opposed to *historic*, as those two terms are used in the Part 292 regulations."¹² Accepting the Koi Nation's arguments would require the Department to effectively eliminate the "significant historical connection" requirement set forth in 25 C.F.R. § 292.12(b) or, at the least, to permissively recast its interpretive standard in such a way that dismantles the coherence of this entire body of

⁷ See Environmental Impact Statement Scoping Report for the Graton Rancheria Casino & Hotel Project (Aug. 2004), available at https://www.gratoneis.com/documents/scoping_report/default.htm. The environmental review process for our gaming facility was conducted by the National Indian Gaming Commission, a sister agency within the Department of the Interior.

⁸ As BIA knows, the Departmental regulations concerning preparation of an EA largely leave public involvement at the discretion of the lead agency. See 43 C.F.R. § 46.305. We are concerned that BIA would nonetheless choose to proceed with an EA for a project of this size and for which the BIA has notice there is substantial public interest.

⁹ See, e.g., BIA, Tejon Indian Tribe Trust Acquisition and Casino Project Scoping Report, Appendix C – Scoping Meeting Transcript (Feb. 2019); BIA, Tule River Indian Tribe Fee-to-Trust and Eagle Mountain Casino Relocation Project Scoping Report, Appendix C – Scoping Meeting Transcript (Apr. 2017); BIA, EIS Scoping Report Wilton Rancheria Fee-to-Trust and Casino Project, Appendix C – Scoping Meeting Sign-In Sheet and Transcript (Feb. 2014).

¹⁰ The Koi Nation must demonstrate it has a "significant historical connection" to the Property in order for the Property to qualify as "restored lands" pursuant to 25 C.F.R. § 292.11(b). "Significant historical connection" means "the land is located within the boundaries of the tribe's last reservation under a ratified or unratified treaty," or—as relevant here—by "historical documentation [of] the existence of the tribe's villages, burial grounds, occupancy or subsistence use in the vicinity of the land." 25 C.F.R. § 292.2.

¹¹ Decision Letter from Assistant Secretary – Indian Affairs Larry Echo Hawk to the Honorable Merlene Sanchez, Chairperson, Guidiville Band of Pomo Indians at 19 (Sept. 1, 2011).

¹² Decision Letter from Acting Assistant Secretary – Indian Affairs Donald E. Laverdure to the Honorable Donald Arnold, Chairperson, Scotts Valley Band of Pomo Indians at 18 (May 25, 2012) (discussing the relocation of individual Band members during the 1920s and 1960s) (emphasis in original).

Departmental precedent. The novelty and potential ramifications of the Koi Nation's restored lands arguments should be addressed head on by the Department before scarce agency resources are further expended on environmental review (particularly if the BIA's decision to proceed as an EA and not an EIS has been driven in part by resource concerns).¹³

The question of a significant historical connection between the Koi Nation and the Property is not simply a matter of regulatory compliance to our Tribe. Our people are from this region. Our sacred sites, burial grounds, ancestral villages, and traditional plant and animal species are rooted here. We are not the only ones and we recognize this shared heritage with our sister tribes in Sonoma County: the Lytton Rancheria of California, the Dry Creek Rancheria Band of Pomo Indians, the Cloverdale Rancheria of Pomo Indians, and the Kashia Band of Pomo Indians. Others, such as the Koi Nation's ancestors, the Southeastern Pomo, have traveled through this region and have certain descendants who made their homes here in modern times. It is an affront, however, to treat those histories as synonymous. Moreover, if the federal government were to reverse its policies and treat these histories as equal, it would undermine our ability to claim and protect our tribal cultural heritage, with cascading impacts that go far beyond the fee-to-trust application at hand.

III. The Appropriate Scope of Issues to be Evaluated through NEPA

Once this proposal is ripe for environmental review, we agree with the BIA that the issue areas identified in the NOP must be considered. These include: land resources/geology and soils; water resources; air quality/greenhouse gases; biological resources; cultural resources; socioeconomic conditions/environmental justice; transportation and circulation; land use; public services and utilities; noise; hazardous materials; aesthetics; and cumulative, indirect, and growth-inducing effects. This project site is located in our ancestral territory. Moreover, our Tribal Citizens and employees live in the vicinity of the project.¹⁴ Therefore, we are deeply invested in the BIA's thorough and objective analysis of the project's impacts.

We particularly wish to emphasize the importance of considering cultural resources and proper National Historic Preservation Act (NHPA) review. As already stated, this Property is within the ancestral territory of the Southern Pomo people, which today includes a number of federally recognized tribes, such as our own. Beyond the presence of a nearby recorded

¹³ This is not a matter of conjecture or hyperbole. As of March 31, 2022, there were 162 pending fee-to-trust applications in the Pacific Region, including one for our Tribe. *See* BIA, Fee-to-Trust Consortium, Status as of March 31, 2022 (circulated by the Pacific Region during the April 6, 2022 quarterly consortium meeting). Most of these applications have been pending for over five years, some for much longer. All of these applications necessitate environmental review pursuant to NEPA and are impacted when the BIA must channel its strapped resources towards projects such as this one.

¹⁴ For example, 89 FIGR Citizens live in the zip code of the project location (95403) and the two nearest zip codes (95492 and 95439). The FIGR government office and the Graton Resort and Casino are approximately an 18-minute drive from the Shiloh parcel.

archaeological site, as noted in the NOP,¹⁵ initial review by our Tribal Heritage Preservation Officer (THPO) indicates that Southern Pomo ancestors were likely on this land and that tribal cultural resources are present. Moreover, the scale of ground disturbance contemplated here—construction of a casino, 200-room hotel, conference/event center, restaurant/bars, parking and infrastructure, and a wastewater treatment plant—means the project has potential to cause effects to a property of traditional religious and cultural importance to our Tribe.¹⁶ The fact that the Property has undergone a low level of prior disturbance due to grading for agriculture and a residential building in no way precludes the presence of and impacts on cultural or historic resources. Moreover, the BIA cannot presuppose or begin to identify mitigation as an option before it fully understands what the effects will be. Accordingly, the BIA must undertake review pursuant to the NHPA and consult with the State Historic Preservation Office (SHPO) and THPOs, including concurrence on the Area of Potential Effects (APE) and necessary identification and evaluation of cultural and historic resources and the project's impacts.

Regarding groundwater resources, the Santa Rosa Plain groundwater basin is designated by the California Department of Water Resources as a medium priority groundwater basin subject to the Sustainable Groundwater Management Act. Our Tribe is an advisory committee member of the Santa Rosa Plain Groundwater Sustainability Agency (GSA), which is working to achieve groundwater sustainability in the region. The GSP documents that groundwater storage is declining at a rate of 2,100 acre-feet per year. Our Tribe implements an on-going well monitoring program on our land as and other nearby wells, as well as mitigation measures to reduce impacts to the groundwater basin. The project would result in an increase in water use and wastewater demand that could significantly drawdown on regional wells and the overall groundwater basin, even with implementation of an on-site tertiary wastewater treatment plant. The EA/TEIR should include a comprehensive water/wastewater assessment, and explain how the proposed project's impacts can be mitigated through funding implementation actions identified in the GSP or through other mitigation measures.

Without yet knowing the actual project design, and given that the NOP provides vague reassurances that “[t]o the extent feasible, the Proposed Project would avoid development within Pruitt Creek and associated riparian corridor,”¹⁷ we recommend that BIA carefully consider impacts to Pruitt Creek and associated riparian areas and/or potential wetlands and whether permitting is required under the Clean Water Act. This is another example of why a full EIS is

¹⁵ NOP at 6 (stating that the “nearest recorded archaeological resource is a lithic scatter approximately ¼ to ½ mile east of the Project site”).

¹⁶ See 54 U.S.C. § 302706 (providing that properties of traditional religious and cultural importance to Indian tribes may be eligible for inclusion on the National Register and requiring federal consultation with tribes on these types of properties); Indian Affairs National Environmental Policy Act (NEPA) Guidebook at 13 (Aug. 2012) (“It should be noted it is the type of activity that is critical for making this [no potential to cause effects] determination, not the presence or absence of a historic property. Consultation with the SHPO/THPO will normally be required to make any further determination regarding the scope of identification efforts and any effects to historic properties.”)

¹⁷ NOP at 6 (emphasis added).

necessary. The BIA should also consider the fact that Project site is located within a FEMA special flood hazard area and whether coordination with FEMA is necessary.

Regarding biological resources, due to the uncertain proximity of the project to Pruitt Creek, which is protected habitat under various federal laws, the BIA should consider Section 7 consultation under the Endangered Species Act. The BIA should also examine the potential presence of special status plant species.

Additionally, while the NOP identifies traffic and public services, generally, as issues to be considered, it is important that BIA seriously evaluate the intersection between wildfire propensity, traffic/evacuation routes, and the concurrent risk to public safety. This project, which will easily bring in tens of thousands of visitors a day, is proposed in a demonstrably wildfire prone area with limited evacuation routes. The risk of wildfire to human health and safety is unfortunately very real to those of us who live in this region and careful planning is essential.

Finally, we urge the BIA to consider additional alternatives, such as alternative project locations that are within the Koi Nation's aboriginal territory of Lake County.¹⁸ According to the NOP, the alternatives presently under consideration are limited to the project as proposed by the Koi Nation, a reduced-intensity alternative, a non-gaming alternative, and a no action alternative. As such, only action or inaction on the Shiloh Road Property is considered. Again, if this project were properly proceeding as an EIS, then NEPA requires, and BIA practice supports, that a reasonable range of alternatives (including other project locations) must be considered.¹⁹

We thank you again for hearing our concerns and hope you will consider them seriously.

Sincerely,

A handwritten signature in black ink that reads "Greg Sarris". The signature is fluid and cursive, with the first letters of "Greg" and "Sarris" being capitalized and prominent.

Greg Sarris
Chairman

¹⁸ See, e.g., 2016 Wilton FEIS, Section 2 – Alternatives (Dec. 2016) (considering, among the alternatives, the tribe's former historic rancheria site).

¹⁹ See, e.g., BIA, 2020 Tejon FEIS, Section 2- Alternatives (Oct. 2020) (analyzing various project alternatives at two different sites and additionally considering but eliminating from further analysis two additional sites); BIA, Final Environmental Impact Statement, North Fork Casino North Fork Rancheria of Mono Indians Fee-to-Trust and Casino/Hotel Project, Section 2 - Alternatives (analyzing various project alternatives at two different sites and additionally considering but eliminating from further analyses 11 additional sites).

Comment Letters
Organizations

[EXTERNAL] Request to be added to service list

schmitcheryl@gmail.com <schmitcheryl@gmail.com>

Mon 9/20/2021 4:15 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

9-20-21

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Hi Chad,

Please add Stand Up For California to the service list for the fee to trust transaction of the Koi Nation's proposed casino in

Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that our organization may make a comment.

Many thanks in advance.

Cheryl Schmit, Director

Stand Up for California

916 663 3207

Standupforcalifornia642@gmail.com note new email address

Stand Up For California!

“Citizens making a Difference”

www.standupca.org

P. O. Box 355
Penryn, CA. 95663

October 25, 2021

Paula Hart, Director
Office of Indian Gaming
U. S. Department of the Interior
1849 C Street N. W.
MS-3542-MIB
Washington D. C. 20240
Fax 202.273.3153 or IndianGaming@bia.gov

RE: RE: Restored Lands Determination – Koi Nation

Dear Ms. Hart,

Stand Up for California is aware of a September 2021 letter that the Koi Nation has sent to the Office of Indian Gaming Management (“OIGM”) requesting a “restored land determination” for property located in an unincorporated area in the County of Sonoma, California, adjacent to the Town of Windsor. The citizens of Sonoma County and citizens of the Town of Windsor have a heightened public interest to participate in all federal processes affecting a potential off-reservation tribal gaming development in their neighborhood. The purpose of this letter is to provide their perspective as well as background information.

In September, the Lower Lake Rancheria (currently calling itself the “Koi Nation of Northern California,” referred to herein as the (“Tribe”)) announced the purchase of 68 acres of vineyard and a residence in Sonoma County for the purpose of developing a casino and resort hotel. This announcement of the purchased property at 222 East Shiloh Road (“Subject Land”) was published in a newspaper of general circulation. In checking the ownership of the property, it is held in the name of Sonoma Rose LLC. Public records from the Office of the California Secretary of State (“SOS”) indicate that the Tribe is a member/manager of the LLC.

The Subject Land for the casino in Sonoma County is approximately 85.5 miles via Highway 101 (according to google) from the Tribe’s historic lands on an island in Clearlake, near Lakeport, the County of Lake, California. If traversing in a straight southernly line, the distance is only 34 miles, however there are no roads that travel in a straight line for this distance and there are geographical barriers that would have hampered easy travel by foot or horseback in historical times.

1. COMMUNITY GROUPS HAVE A RIGHT TO BE CONSULTED

We have been advised that the Tribe submitted a letter to the OIGM on September 15, 2021, requesting a restored lands determination. The OIGM does not have a process for requesting comment from states, local governments, surrounding communities of citizens or even other tribes. This should be a separate public process that focuses on the determination of restored lands. All affected parties, the California Governor, Attorney General and affected local jurisdictions should be involved in the determination. There should be a notification,

comment, and a review and appeal process specific to the determination of whether or not certain lands are Indian lands. This should be a first-step prior to a fee-to-trust application or environmental review. Such a process should be fair, open, and transparent and would eliminate the ability of unscrupulous gaming investors to partner with tribes and reservation shop, abusing the spirit and intent of IGRA. While restored lands determinations from the OIGM are not final agency actions, they do establish the regulatory path for all future Department of the Interior ("Department") analysis and evaluations.

2. SUBJECT LAND HAS NO SIGNIFICANT RELATION TO THE TRIBE

The location of the Subject Land involves the proximity of the land to the tribe's historical roots. Restored lands may include "off reservation" parcels; however, there must be evidence that the land has been in some respect recognized as having a "significant relation" to the tribe. *Grand Traverse Band of Ottawa and Chippewa Indians v. United States Attorney for the Western District of Michigan* ("Grand Traverse Band I"), 46 F. supp. 2d 689,702 (W.D. Mich. 1999). The location factor has been deemed particularly critical by all of the courts and other authorities reviewing restoration situations.

Koi Nation must demonstrate a significant historical connection to the parcel it seeks to game on. Such hard evidence as the Tribes village, burial grounds, occupancy, or subsistence use in the vicinity of the land. (See-section 25 C.F.R. 292.12). Koi Nation cites the establishment of a commercial orchard in Sebastopol by tribal Captain Tom Johnson who is Darin and Dino Beltran's great-great Uncle and his brother John Johnson. Koi Nation identifies the Johnson brothers as leaders of the Tribe from 1919 through the 1940's establishing the Tribe in Sonoma County.

This leads to questions of the whether or not the Johnson brothers exercised tribal governance over a group of people on and off of the orchard lands. Did the tribal group live under state authority and jurisdiction? Did the Tribe live as an independent community outside of the surrounding community? The Johnson's commercial orchard does create a connection in the *vicinity*¹ of the Subject Land; however, it raises significant questions if it demonstrates a significant historical connection with hard evidence?

In 2000, the voters in California supported Proposition 1A which provided a 'limited exception' for the use of casino style gaming, i.e., slot machines and banking games. It was understood that tribal gaming would only occur on Indian lands in mostly rural locations. Tribal leaders and campaign consultants stated regularly in the statewide press, on TV and radio that Indian casinos would not spring up anywhere.

The Subject Land has been without Indian character for more than 171 years. The Koi Nation cannot claim restored lands based on an Indian land claim. That would ignore the 1851 California Land Review Act which established a Commission to review the deeds of California settlers which also included Indian land claims.² California is not subject to Indian aboriginal land claims.

¹ The Johnson commercial orchard if located in the city limits of Sebastopol would be approximately 16 miles from the Subject Land, according to google.

² In *Indians of California v. United States*, 98 Ct.Cl. 583, 1942 WL 4378 (1942), the United States Claims Court noted that California Indians failed to establish their title to any land within the state pursuant to the Act of March 3, 1851, 9 Stat. 631. The 1851 Act was entitled "An Act to ascertain and settle the private land claims in the State of California" and it required all claimants to land title to establish their title to the satisfaction of a Commission established pursuant thereto. The Court observed that none of the Indians of California qualified their land claims before the Commission, meaning that "whatever lands they may have claimed became a part of the public domain of the United States." *Indians of California*, 98 Ct.Cl. At 587 (citing *Barker v. Harvey*, 181 U.S. 481 (1901); *United States v. Title Insurance & Trust Co.*, et al, 265 U.S. 472 (1924)) (emphasis added).

3. IGRA'S NARROW EXCEPTIONS

When a tribe contends that one of IGRA's narrow exceptions applies to permit off-reservation gaming on newly-acquired land, the OIGM Checklist requires a "conclusive factual and legal finding" to support the applicability of a particular exception. The BIA also must obtain a legal opinion from the Office of the Solicitor concluding that the proposed acquisition comes within one of the exceptions, or that a determination that the proposed land meets the legal threshold of IGRA.

Stand Up California believes the Tribe cannot satisfy IGRA's requirements to declare the Subject Land as its "restored land," for four reasons.

First, the Subject Land is not located within or contiguous to the boundaries of the reservation of the Tribe in existence on October 17, 1988. On that date the Tribe was not included on the list of federally recognized tribes and did not have a land base, did not reside on land set aside under the federal protection against other jurisdictions, and did not assert governmental powers over any land. F. Cohen, Handbook of Federal Indian law at 34-35 (1982 Ed.).

Second, the Tribe never had a recognized reservation in, or anywhere near the vicinity of, the Subject Land. Indeed, the Tribe's historical lands are located near Lakeport, Lake County, CA, approximately 85.5 miles from the Subject Land.

Third, the Subject land is not part of a land claim settlement.

Fourth the Koi Nation has not been recently acknowledged by the Secretary under the federal acknowledgement process. (Part 83 Final Rule.) Rather the Tribe was administratively *reaffirmed*, and the Court in 2019, has ruled it to be treated as a "restored Tribe". The question now becomes does the Subject Land meet the criteria of restored lands?

Should the Subject Land not meet a restored lands determination criteria, then the two-part Secretary Determination of 25 U.S.C. Section 2719 (b) (1) (A) is the only statutorily permitted way for a tribe to conduct gaming on After-Acquired Lands.³ As the OIGM determined in recent time with the Tejon Tribe of Kern County, and previously a negative determination for the Scotts Valley Tribe at Vallejo, Solano County California, such determinations are equally applicable to the Tribe's claim for the Subject Land Sonoma County.

4. RESTORED LANDS DEFINED

IGRA itself does not define "restoration of lands," and the case law and other precedent interpreting whether lands taken into trust are properly "restored" within the meaning of 25 U.S.C. section 2719(b)(1)(B)(iii) is sparse. *See, e.g., City of Roseville vs. Norton*, 219 F. Supp. 2d 130 (D.D.C. 2002), *aff'd*, 348 F.3d 1020 (D.C. Cir. 2003), *cert. denied*, *Citizens for Safer Cmty. v Norton*, 541 U.S. 974 (2004); *Grand Traverse Band of Ottawa and Chippewa Indians vs. United States Atty. for the W. Dist of Mich.*, 198 F. Supp. 2d 920 (W.D. Mich. 2002), *aff'd*, 369 F.3d 960 (6th Cir. 2004); *Oregon vs. Norton*, 271 F. Supp. 2d 1270 (D. Ore. 2003) (reviewing decision of Secretary following remand by court in *Confederated Tribes of Coos v. Babbitt*, 116 F. Supp. 2d 155 (D.D.C. 2000)). *See also, in re Wyandotte Nation Amended Gaming Ordinance*, NIGC Final Decision (September 10, 2004) ("*Wyandotte Decision*"); NIGC Letter to B. Downes re Karuk Tribe of California (October 12, 2004) ("Karuk case" or "Karuk Opinion"); NIGC Memorandum Mechoopda Indian Tribe of the

³ This statement reflects the same opinion as Acting Deputy Assistant Secretary for Policy and Economics Development, George T. Skibine in a letter dated May 12, 2006, to Chairwoman Merlene Sanchez

Chico Rancheria (March 14, 2003) ("Mechoopda case" or Mechoopda Opinion"); NIGC Memorandum re Bear River Band of Rohnerville Rancheria (August 5, 2002) ("Bear River case" or Bear River Opinion").

In *Confederated Tribes of Coos*, the court recognized that the term "restoration" can be limited to avoid the result where "any and all property acquired by restored tribe would be eligible for gaming." The *Coos* court further observed:

The term "restoration" may be read in numerous ways to place belatedly restored tribes in a comparable position to earlier recognized tribes while simultaneously limiting after-acquired property in some fashion.

There are express limits to what constitutes "restored lands". As the NIGC stated in its Grand Traverse Opinion: [W]e believe the phrase "restoration of lands", is a difficult hurdle And may not necessarily be extended, for example, to any lands That the tribe conceivably once occupied throughout its history.

NIGC Grand Traverse Opinion, August 31, 2001, also Office of the Solicitor's memorandum Re: *Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians v. Babbitt* ("it also seems clear that restored land does not mean any aboriginal land that the restore tribe ever has occupied).

The test applied in the *Coos* case requires that the land to be considered part of any restoration shall be limited by:

- (1) the factual circumstance of the acquisition.
- (2) the location of the acquisition; and
- (3) the temporal relationship of the acquisition to the restoration

Placement within a prior reservation of the tribe also is significant evidence that the land may be considered in some sense restored. In any event, "restoration" does not mean "acquired." Therefore, there must be other evidence that the proposed acquisition of the **Subject Land "restores" to the Tribe what is previously had.**

5. SUBJECT LAND AND APPROPRIATE RESTITUTION

When making a 25 U.S.C Section 2719 (b)(1)(B)(iii) determination, a general rule of equity, such a balancing of interests, is plainly required by the Indian Reorganization Act, NEPA, and IGRA itself. The Secretary of the Department must consider whether "restoring" the Subject Land to the Tribe for gaming purposes would:

- (1) truly restore a sense of parity with other tribes.
- (2) eliminate disadvantages as against other tribes; and
- (3) Places the Tribe in a comparable position with earlier recognized and landed tribes.
- (4) While the Secretary must conclude the acquisition (i) is in the "best interest" of the Tribe and its members, the Secretary must also determine that it will not be (ii) "detrimental" to the surrounding community. 25 U.S.C. Section 2719 (b) (1) (A).

Even more importantly to the equities analysis is recognition that the Tribe cannot be put into a better position than what it previously had; the Tribe can only be placed in a position comparable to its prior position. In short, the equities of this case mandate against finding the restoration exception as applicable. Acquiring the Subject Land for casino gaming purposes would grant the Tribe the right to operate a casino along one of California's most traveled north/south highways, near a residential track of homes, near children's schools and within the

sphere of influence of the family-centered Town of Windsor, population of 27,447. This would affect other Tribal governments, such as possibly the Federated Indians of the Graton Rancheria or the Dry Creek Rancheria.

The Subject Land is accessible by Highway 101 by way of East Shiloh Road or Old Redwood Highway. Both have limited traffic controls and are unlit, two-lane country roads near a community park and a newly proposed project of homes. These are the main egress and ingress roads local residents have to use for daily transportation as well as wildfire evacuations, which have occurred two to three times in the last few years. Casino traffic on these roadways would exacerbate evacuations and potentially cause loss of life.

Casino gaming on the Subject Land would certainly divert gaming that would otherwise occur at already operating tribal casinos some in more remote locations. In fact, near the Tribe's Lake County historic area, the Big Valley Rancheria and Robinson Rancheria have established casinos on historic lands.

Historical records do not assist the Tribe in their quest for a restored lands determination in Sonoma County. The 1923 records of the Reno Indian Agency⁴ ("Agency") indicate an approximate population of six hundred Indians comprising nine groups residing in Lake County. One of the nine groups, the Lower Lake Koi consisted of thirteen families, thirty-seven persons including eight minors. Congress appropriated funds in 2014 for the purchase of lands for homeless Indians. The Agency purchased 140.46 acres of land in 1916. By 1947 according to the House Report H.R.585 authorizing the conveyance of the Rancheria to Lake County of the Lower Lake Koi Rancheria only two Indians resided on the track of land. The land was sold to Lake County for an Airport, but 41 acres was placed in fee for an Indian, Mr. Harry Johnson.

A Cultural Resources Evaluation report filed May 17, 2021, titled: Cultural Resources Study for the Windsor Residences Project at the Corner of Old Redwood Highway and Shiloh Road Windsor, Sonoma County, California, by Eileen Barrow, M.A./R.P.A.⁵

"This report was prepared for CRP Affordable Housing & Community Development project. This project is located directly across the street from the Subject Land and includes the Subject Land. A request was sent to the State of California's Native American Heritage Commission (NAHC) seeking information from the Sacred Lands File and the names of Native American individuals and groups that would be appropriate to contact regarding this project." Letters were sent to the following groups:

- Cloverdale Rancheria of Pomo Indians of California
- Dry Creek Rancheria of Pomo Indians
- Federated Indians of Graton Rancheria
- Guidiville Band of Pomo Indians
- Kashia Band of Pomo Indians of the Stewarts Point Rancheria
- Lytton Rancheria of California
- Middletown Rancheria of Pomo Indians of California
- Mishewal-Wappo Tribe of Alexander Valley
- Pinoleville Pomo Nation

⁴ Annual Report 1923 Reno Indian Agency: RG 75 Reno Indian Annual narrative and Statistical Reports 1912-1924 Box 6; Folder (Annual Narrative Reports 1923 Reno Ind. Ag.) pages 12-13

⁵ <https://www.townofwindsor.com/DocumentCenter/View/21738/Appendix-C---Cultural-Resources-Assessment>

The NAHC replied with a letter dated May 6, 2021, which indicated that a search of the Sacred Lands File showed that there are cultural resources within the township and range of the APE. They added that the Mishewal-Wappo Tribe of Alexander Valley should specifically be contacted about this.

Plainly missing from this list is the name Koi Nation, Lower Lake Rancheria, Lower Lake Koi, or any other name which the Tribe has used in the past.

Evidence of reservation shopping: The Tribe has been reservation shopping since early 2002. This has been documented in the press and in City and County Board of Supervisor meeting minutes. Prominent investors, law firms and elected officials are named as persons hired by the Tribe to assist in its quest to establish a casino somewhere in California. For example, in January of 2005, the Tribe presented a power point presentation to the City of Oakland in the San Francisco Bay Area. The proposed casino would house 2000 slot machines and include a 1000 seat entertainment venue with four or five restaurants and a luxury hotel.⁶ The Tribe offered the city council \$35 million in a proposed mitigation agreement to support the project.

At that time (2005), attorneys from the East Bay Regional Park Service were requesting the Secretary of the Interior to retract the decision of the Assistant Secretary Indian Affairs that reaffirmed the federal status of the Lower Lake Koi in the December 29, 2000, decision. Further, the agency wanted the Tribe removed from the list of federally recognized tribes published pursuant to 25 U.S.C. 479a-1. (List of Federally Recognized Tribes, aka: List Act)

With respect to the Subject Land, no Indian lands have existed in the region since at least as early as 1850, when California became a State and exercised governance over the Subject Land. Sonoma County was one of California's original counties. In other words, without dispute for 171 years, no Indian lands have existed at the site of the Subject Land (i.e., all land has been subject to local, state, and federal Law). Common sense dictates that it is unreasonable to place a new political entity for the purpose of establishing a casino which enjoys immunity to civil liability and tax exemption that for 171 years has been subject to local, state, and federal law and in the private ownership of generations of private citizens. The very nature of tribal sovereignty will impact and erode the cultural, political, and economic systems of the regional area.

In reality, the Tribe is once again asking for the remedy of a multi-million-dollar casino, asserting that this is equitable and reasonable relief because of an error made by the Department in terminating their status as Indians.⁷ The Tribe and its investors are simply trying to do an "end run" around the two-step Secretary Determination process, precluding public, state, local government and tribal government comment on such a significant project should not be permitted under any circumstances.

The Subject Land by review of federal documents is not restored lands. Should the Tribe wish to proceed with the fee-to-trust process, it must abide by a two-step Secretary Determination process.

CONCLUSION

The non-tribal populations, agriculture interests, affected local governments and nearby tribes surrounding the Subject Land have justifiable expectations that the land remains similar in character. If changes in zoning, jurisdiction and critical health and safety issues regarding a change in the governing authority occur, then it should be determined in an open, fair, and transparent process.

⁶ Feb. 8, 2005, Berkeley Daily Planet, North Oaklanders Blast Airport Casino Plan by Richard Brenneman

⁷ United States Department of the Interior, Memorandum 12-29-1999 to Regional Director, Alaska Region and Regional Director, Pacific Region from Assistant Secretary Kevin Grover subject: Reaffirmation of Federal Recognition of Indian Tribes.

Stand Up California accordingly urges the following determinations be made:

- The Subject Land cannot be taken into trust under the "restored lands" exception under the IGRA.
- The Subject Land must instead adhere to the two-part Secretary determination.
- The Tribe must seek restored lands in its historic area.

We hope you will find these comments helpful and useful in preparation of your restored lands determination decision-making process, for an Indian lands determination for the Tribe in Sonoma County will have far reaching impacts for the neighboring communities and environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Schmit". The signature is fluid and cursive, with the first name "Cheryl" and last name "Schmit" clearly distinguishable.

Cheryl A. Schmit

Stand Up for California

StandUpForCalifornia642@gmail.com

916 663 3207

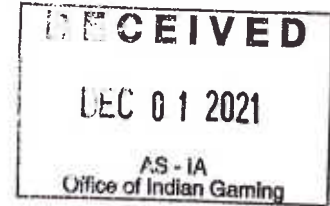
Our Community Matters
An Association of Neighbors in Sonoma County, CA

5828 Matilde Drive
Windsor, California 95492

Telephone: (707) 293-4919
Email: ourcommunitymatters2@gmail.com

October 30, 2021

Paula Hart, Director
Office of Indian Gaming
U.S. Department of the Interior
1849 C Street, N.W.
MS-3543-MIB
Washington, D.C. 20240



Re: Request for Restored Lands Determination by Koi Nation

Dear Director Hart:

Our Community Matters, a neighborhood association of over 150 Sonoma County residents, submits this letter in opposition to the request for a "restored lands" determination sought by the Koi Nation of Northern California, previously called the Lower Lake Rancheria (the "Tribe"). The Tribe announced that it has recently purchased 68 acres of land in the unincorporated area of Sonoma County for the purpose of building a 1.2 million square foot casino calling for 2,500 slot and other gaming machines, a 200-room hotel, six restaurant and food service areas, a meeting center, and a spa. We understand the Tribe is seeking an exception to the prohibition of gaming on newly-acquired lands pursuant to the 1988 Indian Gaming Regulatory Act ("IGRA").

The subject property contains several vineyards and a single grand residence, located at 222 E. Shiloh Road, Santa Rosa, California (the "Shiloh Property"). Sonoma County records reveal that a California limited liability company named Sonoma Rose LLC purchased the Shiloh Property on September 1, 2021. (See Attachment 1.) The Tribe does not currently hold ownership of the land in its own name.

The Shiloh Property directly abuts the Southeast edge of the Town of Windsor (population 27,447) and lies at the corner of two main traffic arteries, Shiloh Road and Old Redwood Highway. Many houses are directly across the street from the property along East Shiloh as well as Old Redwood Highway, including homes in the Oak Park subdivision and the Colonial Park mobile home park.

Neighbors formed *Our Community Matters* for the sole purpose of opposing the Tribe's proposed mega-casino and resort on the Shiloh Property, as we are convinced the project would be devastating to our community, cause health and safety issues, and negatively impact the environment. Put simply, the location is inappropriate for the Tribe's proposed mega-casino and resort project.

For purposes of the Office of Indian Gaming Management's ("OIGM's") review, it is perhaps even more important that the Tribe has no historical connection to the Shiloh Property nor the surrounding community. The Tribe has simply gone shopping for a place to put a casino and, without consulting any neighbors or local government officials, has decided that our backyard is the best place for it. The location, however, is not well-chosen, and construction of the mega-casino and resort will likely have damaging consequences.

Below is a discussion of the issues and what we have discovered.

I. The Tribe's Request for Permission to Game on the Shiloh Property Should Be Denied Under IGRA

A. IGRA's Legal and Regulatory Framework

Indian tribes may operate casinos only on "Indian lands" that are eligible for gaming under the IGRA. To be deemed "Indian lands" per the IGRA (25 U.S.C. § 2703), the land must be located within the limits of a tribe's reservation, be held in trust by the United States for the benefit of the tribe or its members, or be land subject to restrictions against alienation by the United States for the benefit of the tribe or its members. Additionally,

the tribe must have jurisdiction and exercise governmental powers over the gaming site. If the land is not “Indian lands” and fails to meet these other requirements, then it is subject to state gambling laws.¹

Importantly, the IGRA (25 U.S.C. § 2719 (“Section 2719”)) contains a general prohibition against gaming on lands acquired into trust after October 17, 1988. Tribes may game on such after-acquired trust land only if the land meets one of the two exceptions listed in Section 2719:

1. If the Secretary, “after consultation with the Indian tribe and appropriate State and local officials, including officials of other nearby Indian tribes, determines that a gaming establishment on newly acquired lands would be in the best interest of the Indian tribe and its members, and would not be detrimental to the surrounding community, but only if the Governor of the State in which the gaming activity is to be conducted concurs in the Secretary’s determination” (25 U.S.C. § 2719(b)(1)(A)); and
2. The lands are “taken into trust as part of— (i) a settlement of a land claim, (ii) the initial reservation of an Indian tribe acknowledged by the Secretary under the Federal acknowledgment process, or the restoration of lands for an Indian tribe that is restored to Federal recognition.” (25 U.S.C. § 2719(b)(1)(B)(iii).)

Our Community Matters understands the Tribe is not seeking to utilize the first of these exceptions to obtain permission to build a casino on its newly-acquired land per 25 U.S.C. § 2719(b)(1)(A), as doing so would require it to consult with State and local officials and other nearby tribes. Rather than reaching out to these community groups and officials to gain support for its mega-casino project, the Tribe simply announced it via the press, to the surprise of Federal, State, and local officials.² The Tribe is seeking to circumvent this collaborative process most likely due to the fact that it has used it in the past to no avail: we understand the Tribe’s previous requests to build casinos in Vallejo and Oakland were soundly rejected.

The Tribe is thus currently invoking the second exception, seeking to be deemed a “restored tribe” and for its purchase of the Shiloh Property to be considered a “restoration of lands” under Section 2719(b)(1)(B)(iii). While a District Court has determined the Tribe is a “restored tribe” under IGRA,³ the Tribe’s request for the Shiloh Property to be deemed a “restoration of lands” should be rejected.

Because the IGRA does not define the term “restoration of lands,” and the language is susceptible to multiple meanings, it is subject to interpretation by the Department of Interior (“DOI”) through regulation.⁴ The DOI has adopted regulations to interpret the exception, as well as “[w]hat must be demonstrated to meet the ‘restored lands’ exception” found at 25 U.S.C. § 2719(b)(1)(B)(iii). (25 C.F.R. § 292.7; Gaming on Trust Lands Acquired After October 17, 1988, 73 Fed. Reg. 29,354 (May 20, 2008) (“Part 292”).)

¹ See National Indian Gaming Commission: Definitions Under the Indian Gaming Regulatory Act, 57 Fed. Reg. 12382, 12388 (1992).

² See <https://www.pressdemocrat.com/article/north-bay/koi-indian-tribe-unveils-plans-for-600-million-casino-resort-in-sonoma-cou/>.

³ See *Koi Nation of N. California v. United States Dep’t of Interior*, 361 F. Supp. 3d 14 (D.D.C. 2019), amended sub nom. *Koi Nation of N. California v. United States Dep’t of the Interior*, No. CV 17-1718 (BAH), 2019 WL 11555042 (D.D.C. July 15, 2019), and appeal dismissed sub nom. *Koi Nation of N. California v. United States Dep’t of the Interior*, No. 19-5069, 2019 WL 5394631 (D.C. Cir. Oct. 3, 2019). While there may be other challenges to the Tribe’s status as a “restored tribe” under IGRA not addressed in that decision, *Our Community Matters* expresses no opinion on that issue.

⁴ See, e.g., *Grand Traverse Band of Ottawa and Chippewa Indians v. U.S. Attorney for W. Dist. of Mich.*, 198 F. Supp. 2d 920, 928 (W.D. Mich. 2002), aff’d 369 F.3d 960 (6th Cir. 2004); *Oregon v. Norton*, 271 F. Supp. 2d 1270, 1277 (D. Or. 2003).

Pursuant to Part 292, to show that lands qualify as “restored,” a tribe must establish:

- (a) a modern connection to the lands;
- (b) a significant historical connection to the lands; and
- (c) a temporal connection between the date of acquisition and the tribe’s restoration.

(25 C.F.R. § 292.12 (“Section 292.12”).)

To demonstrate a “significant historical connection” under Part 292, a tribe can either (a) show that “the land is located within the boundaries of the tribe’s last reservation under a ratified or unratified treaty”; or (b) “demonstrate by historical documentation the existence of the tribe’s villages, burial grounds, occupancy or subsistence use in the vicinity of the land.” (25 C.F.R. § 292.2.) As the DOI explained in the preamble to Part 292, the word “significant” was used because it “reinforces the notion that the connection must be something more than ‘any’ connection.” (73 Fed. Reg. at 29,366.)

Further, the structure of Section 292.12 indicates that the connection demonstrated must be to the newly-acquired land itself, not simply its surrounding area. As explained in the preamble to the final rule promulgating Part 292, what is required is “something more than evidence that a tribe merely passed through a particular area.” (73 Fed. Reg. at 29,366.)

B. The Shiloh Property is Not the Tribe’s “Restored” Lands

The Tribe’s request for the Shiloh Property to be deemed its “restored” lands does not meet Section 292.12’s second requirement, that the Tribe have a “significant historical connection” to that land, for two reasons.

First, the Shiloh Property is not located within the boundaries of the Tribe’s last reservation under a ratified or unratified treaty. (See 25 C.F.R. § 292.2.) The Tribe’s last reservation was purchased by Congress in 1916: a 140-acre parcel in Lake County between the towns of Lower Lake and Clear Lake Heights known as Purvis Flat. Purvis Flat is approximately 49 miles from the Shiloh Property; the Shiloh Property simply does not fall within the reservation’s boundaries. Further, on its website, the Tribe verifies that after the government sold Purvis Flat to Lake County for a municipal airport, the Tribe became landless.⁵ Accordingly, the Tribe cannot reasonably claim the Shiloh Property is located within the boundaries of the Tribe’s last reservation.

Second, research has revealed no evidence to demonstrate the existence of the Tribe’s villages, burial grounds, occupancy or subsistence use in the vicinity of the Shiloh Property. (See 25 C.F.R. § 292.2.) In fact, the Tribe’s ancestral home was on an island in Clear Lake in Lake County, approximately 55 miles North of the Shiloh Property.⁶ The distance between the Shiloh Property and the Tribe’s ancestral lands is just too great to demonstrate a “significant historical connection” between the two. In addition, the Tribe’s lack of historical connection to the Shiloh Property area was also recently verified in a Cultural Resources Study focusing on property at the corner of Shiloh Road and Old Redwood Highway, presented to the Town of Windsor’s Planning Commission regarding a proposed residential project at that corner.⁷ While nine tribes were listed as possibly having a historical connection to the area, none of them were the Koi Tribe.

While the Tribe will likely argue that some of its members have resided in Sonoma County over the past hundred years or so, such a factor is insufficient to demonstrate a “significant historical connection” to the Shiloh Property. Indeed, while a tribe’s activities in the vicinity of a property may be used to reasonably infer a

⁵ See <https://www.koinationsonoma.com/history/>.

⁶ See <https://www.koinationsonoma.com/history/>.

⁷ See https://windsor-ca.granicus.com/MetaViewer.php?view_id=2&clip_id=1308&meta_id=81164, at pages 10, *et seq.*, and Attachment A.

tribe used the subject property for subsistence use, no such inference can be made by showing tribal members lived within a 10-20 mile radius of the property in modern times. Section 292.12 requires the Tribe to show a connection to the newly-acquired land *itself*, not just the surrounding area, as it provides that “[t]o establish a connection to the newly acquired lands [for the purposes of the restored lands exception] . . . [t]he tribe must demonstrate a significant historical connection *to the land*.” (emphasis added). Research has revealed no evidence the Tribe or its members have had any connection to the Shiloh Property *itself*, and such a connection is highly unlikely due to the fact the property has been in private hands.

Moreover, the DOI’s past “restored lands” decisions also demonstrate the Shiloh Property should not be declared a “restoration of lands” for the Tribe. For example, on February 7, 2019, the DOI denied a request by another Lake County Indian tribe, the Scotts Valley Band of Pomo Indians (“Scotts Valley”), for a “restored lands” determination for its newly-acquired parcel in the City of Vallejo, California.⁸ In fact, Scotts Valley had a stronger case than the Tribe for a restored lands determination, as it claimed its ancestors collected provisions near the subject land, and that a tribal chief traveled in the region throughout his life, may have been baptized 17 miles from the land, and worked as a ranch hand and migrant laborer in the area of the land. Despite these ties, the DOI determined that Scotts Valley had failed to show a “significant historical connection” to the subject land because the intermittent presence of the Tribe’s ancestors did not indicate a broader presence to the area as a whole, and there was no evidence of ancestral use of the subject land itself. Scotts Valley has sought to overturn that decision via judicial review, and the DOI’s motion papers filed in the case on October 1, 2021, demonstrate its commitment to enforcing current DOI regulations and policies on those issues.⁹

Moreover, the Federated Indians of Graton Rancheria has gone on record opposing the Tribe’s request for a “restored lands” determination for the Shiloh Property. Specifically, Chairman Greg Sarris stated in an article he authored: “This is an egregious attempt at reservation shopping outside the Koi Nation’s traditional territory and within the territory of other federally recognized tribes.”¹⁰ *Our Community Matters* believes this is the heart of the issue, and that the Tribe’s request for the Shiloh Property to be deemed its “restored” lands should be denied.

II. The Shiloh Property is an Inappropriate Location for a Casino and Resort

While not expressly part of the “restored lands” analysis, *Our Community Matters* believes it is also important to consider how inappropriate the Shiloh Property is for the location of a mega-casino and resort, as follows.

A. Proximity to Residences, Parks, and Elementary Schools

As shown on an aerial view of the Shiloh Property (see Attachment 2), it is located across the street from two housing areas on the North side and a mobile home park the West side (there is also a church on the West side). Esposti Park, which is a sports park utilized heavily by Little League teams, is located directly North across the street from the Shiloh Property at the corner of E. Shiloh Road and Old Redwood Highway.

In addition, the attached photo does not show the following: (1) Shiloh Park, a Sonoma County Regional Park which allows for nature-based hiking and horseback riding, is located just 0.4 miles to the West of the Shiloh Property; (2) San Miguel Elementary School, including its surrounding residential neighborhood, is located just 1.4 miles South of the Shiloh Property; (3) Mark West Union Elementary School, including its surrounding residential neighborhood, is located just 1.9 miles from the Shiloh Property; (4) Mattie Washburn Elementary

⁸ See <https://www.timesheraldonline.com/wp-content/uploads/2019/08/DOI-Letter-Scotts-Valley-Restored-Lands-Decision-re-Vallejo-2-7-2019-1.pdf>

⁹ See *Scotts Valley Band of Pomo Indians v. U.S. Dept. of the Interior*, U.S. Dist. Ct., District of Columbia, Case No. 1:19-CV-01544-ABJ, Memorandum in Support of Federal Defendants’ Cross Motion for Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment, Dkt. No. 55, Filed October 1, 2021.

¹⁰ See <https://www.pressdemocrat.com/article/news/graton-rancheria-statement-on-koi-nations-application-for-gaming-facility/>.

School, including its surrounding residential neighborhood, is located just 2.1 miles away from the Shiloh Property; and (5) both Shiloh Road and Old Redwood Highway are major travel arteries for the community.

There is simply insufficient space between the Tribe's proposed mega-casino/resort and these residences, parks and schools to prevent negative effects from noise pollution, light pollution, car exhaust pollution, and traffic from impacting the community. The ecological effects alone in this relatively rural and bucolic area would be substantial. Moreover, the associated negative aspects that ride along with casinos, such as theft, vandalism, drug use, trespassing, etc., would have an overwhelmingly negative impact on our small community.

Further, we are experiencing extreme drought at this time,¹¹ which is expected to be the new normal due to climate change. The Tribe's proposed mega-casino and resort would put tremendous demands on our local resources, including our water table, which we expect will cause water and other conditions to worsen.

B. Lack of Sufficient Wildfire Evacuation Corridors

In the 2017 Tubbs wildfire, over 5,300 homes in Sonoma County burned to the ground. Many of those homes were located just a few minutes' drive to the South of the Shiloh Property. The wildfire came without warning in the night, and there were no emergency messages or evacuations. Since that time, local emergency services aim to provide sufficient warning of wildfires, to enable residents to evacuate with their lives, their pets, and some property.

Attachment 3 to this letter contains a map showing the number and locations of wildfires in the area since 2015 which have ravaged our landscape, both physical and emotional. *Our Community Matters* members have evacuated two to three times in the past four years due to wildfires. For example, in 2019, our members and 50,000 Sonoma County residents were ordered to evacuate to escape the Kincadee Wildfire. Evacuating residents caused traffic jams at the corner of Old Redwood Highway and Shiloh Road, which became almost impassable. Highway 101, the primary North-South artery, was at a standstill Southbound, leading away from the fire.

The Tribe's proposal to develop a mega-casino and resort on the Shiloh Property could very well have life threatening consequences for our community members, as there are simply not enough evacuation routes for us let alone the tens of thousands of people the Tribe expects to host on the property. Further, removing the vast majority of the vineyards on the Shiloh Property will increase the fire threat to our community, as vineyards have proven to be a significant fire break.

C. Lack of Hospitality Workers

The Tribe has indicated it plans on hiring 1,100 employees to work the casino and resort. However, there is a shortage of hospitality workers in our area that has reached the critical stage. In fact, a local restaurant just down the street from the Shiloh Property recently announced it will have to close because it cannot find workers to staff it.¹²

The local newspaper, the Press Democrat, reported in a September 1, 2021, article that "[t]hroughout the country, restaurants are facing a critical shortage of workers... Locally, restaurants have even resorted to

¹¹ See <https://www.drought.gov/states/California/county/Sonoma>.

¹² See <https://www.sonomamag.com/this-is-the-new-reality-popular-santa-rosa-creperie-closes-for-lack-of-staff/?gSlide=1>.

closing on certain days, because of the staffing crunch.”¹³ The workforce shortage is due primarily to the “extremely high cost of living and a shortage of affordable, workforce housing” in our area.¹⁴

Our Community Matters is concerned about the Tribe’s proposed mega-casino and resort taking employees away from our local businesses, causing more of them to close and further decreasing the unique and diverse aspects of our community.

III. Conclusion

Our Community Matters urges the OIGM to reject the Tribe’s request for a “restored lands” exception to the prohibition of gaming on newly-acquired lands. We believe the Shiloh Property is not the Tribe’s restored lands, and that the Tribe has no actual connection to that land from either a modern or historical perspective. Moreover, we believe that the Tribe’s proposed mega-casino and resort would be simply devastating to our community.

We appreciate your consideration of these issues. Should you have any questions, or would like further information, please let me know.

Best regards,



Nina Cote
Steering Committee Chair
Our Community Matters

cc: Robert Pittman, County Counsel, County of Sonoma – Email only: robert.pittman@sonoma-county.org
Jose Sanchez, City Attorney, Town of Windsor – Email only: jsanchez@meyersnave.com
Jared Huffman, U.S. Representative – Fax only: (202) 225-5163
Michael Thompson, U.S. Representative – Fax only: (202) 225-4335
Gavin Newsom, Governor of the State of California – Fax only: (916) 558-3160
Darryl LaCounte, Director of the Bureau of Indian Affairs, DOI

¹³ See <https://www.northbaybusinessjournal.com/article/news/starks-restaurant-group-in-sonoma-county-hosts-party-and-lottery-to-coax-wo/>; see also <https://www.pressdemocrat.com/article/news/sonoma-county-restaurants-still-struggling-in-2021/>; see also <https://www.pressdemocrat.com/article/business/sonoma-county-hospitality-sector-struggles-to-find-workers-despite-high-job/>; see also <https://www.sonomanews.com/article/news/help-wanted-sonoma-valley-businesses-struggle-to-hire/>.

¹⁴ See <https://www.northbaybiz.com/2021/07/19/labor-shortages-in-a-post-pandemic-world/>.

Attachment 1

Page 1 of 3

RECORDING REQUESTED BY:
Fidelity National Title Company

When Recorded Mail Document
and Tax Statement To:
SONOMA ROSE, LLC

2021100185

OFFICIAL RECORDS OF SONOMA COUNTY
DEED 0001 05:11 AM
FIDELITY NATIONAL TITLE | SONOMA, NADA | 000
DEED 5 Pgs
Fee: \$38.00
County Tax: \$13,530.00

Escrow Order No.: FSNK-7052000401CF
Property Address: 222 E. Swish Road,
Santa Rosa, CA 95403
APN/Parcel ID(s): 059-300-003-000

GRACE ABOVE THIS LINE FOR RECORDERS USE
Exemption fee per GC 21088.1(a)(2): This document is a transfer that is subject to
Documentary Transfer Tax.

GRANT DEED

The undersigned grantor(s) declare(s):

☐ This transfer is exempt from the documentary transfer tax.
☒ The documentary transfer tax is \$13,530.00 and is computed on:
☒ the full value of the interest or property conveyed
☐ the full value less the liens or encumbrances remaining thereto at the time of sale.
The property is located in an Unincorporated area.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, Randall G. Clifton and Cynthia A. Clifton, Trustees of The Randall G. Clifton and Cynthia A. Clifton Trust Agreement dated June 30, 2005

hereby GRANT(S) to SONOMA ROSE, LLC, a California limited liability company

the following described real property in the Unincorporated Area of the County of Sonoma, State of California:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

PROPERTY COMMONLY KNOWN AS: 222 E. Swish Road, Santa Rosa, CA 95403

MAIL TAX STATEMENTS AS DIRECTED ABOVE

Grant Deed
CD4081783.doc / 10/26/21 10:11 AM
10/27/2021 10:11 AM

GRANT DEED
(continued)

APN/Parcel ID(s): 059-300-003-000

Dated: September 1, 2021

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below

The Randall C. Clifton and Cynthia A. Clifton Trust Agreement dated June 30, 2006

BY Randall C. Clifton
Randall C. Clifton, Trustee

BY Cynthia A. Clifton
Cynthia A. Clifton, Trustee

A notary public or other officer completing this certificate
verifies only the identity of the individual who signed this
document to which this certificate is attached, and not the
truthfulness, accuracy, or validity of that document.

State of California
County of San Diego

On September 1, 2021 before me, Conrad Hernandez Notary Public,
(here insert name and title of the officer)

personally appeared Randall C. Clifton and Cynthia A. Clifton
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to this
written instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies),
and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s)
acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and
correct.

WITNESS my hand and official seal.

Signature



EXHIBIT "A"
Legal Description

For APN/Parcel ID(s): 059-303-003-000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA IN COUNTY OF SONOMA, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

Being a tract of land in Section 20, Township 8 North, Range 5 West, M.D.G. and M. and beginning at a iron pin which marks the 1/4 section corner between Sections 19 and 20, thence East along the Northernly line of the Southwest 1/4 of said Section 20, a distance of 40.00 chains, more or less, to the center of Section 20; thence South, along the Easternly line of said Southwest 1/4, 17.61 chains, more or less, to the Northeast corner of a tract of land conveyed by Elsie C. Mayo to Charles T. Mathison and Cynthia E. Mathison, his wife, by Deed dated January 28, 1905 in Book 216 of Deeds at Page 298, Sonoma County Records; thence South 70° 18' West, along the Northernly boundary of said tract of land conveyed to said Mathison, 25.69 chains, more or less, to the corner of the State Highway leading from Santa Rosa to Healdsburg; thence Northwest along the center of said State Highway, 20.85 chains, more or less, to the section line between Sections 19 and 20; thence North along said section line, 62 chains, more or less, to the point of beginning.

Excepting therefrom that portion thereof conveyed to the County of Sonoma by deed recorded April 25, 1950 in Book 555 at Page 376, Sonoma County Records.

Also excepting therefrom that portion conveyed to the County of Sonoma by Deed recorded October 27, 2006 as Instrument No. 2006132958, of Official Records.

Attachment 2

Aerial Photo of the site of the Casino and Resort proposed by the Tribe, located at 222 E. Shiloh Road, Santa Rosa, CA. The Casino and Resort project is outlined in blue; Esposti Park is outlined in green; the pink line shows the boundaries of the Town of Windsor to the North versus unincorporated Sonoma County to the South.

The proposed Casino and Resort is a 1.2 million-square-foot project calling for 2,500 slot and other gaming machines, a 200-room hotel, six restaurant and food service areas, a meeting center and a spa. It is expected to employ approximately 1,100 employees.



Photo obtained from the SoCoNews: https://soconews.org/scn_windsor/news/windsor-officials-clarify-town-not-involved-with-koi-nation-casino/article_0e7adef2-2871-11ec-93c3-536857a5e1cf.html and not verified by Our Community Matters.

Attachment 3

Locations of Recent Wildfires (Since 2015)



From: Josh Ratiani (Shiloh Neighborhood)
Sent: Tuesday, June 14, 2022 12:36 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>; tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am writing in regards to the Koi Nation Shiloh Resort Environmental Impact study. **I am the Pastor of Shiloh Neighborhood Church**, directly across Old Redwood Highway from the property being studied. I also have lived in the house on the property for the past 11 years, just across the street from the current vineyard.

I am concerned about a number of environmental impacts should the property containing the current vineyard and creek be developed.

First, the vineyard serves as a **fire break**. In 2017, the Tubbs Fire came right up to Shiloh Regional Park, across from the vineyard (pictures attached, taken from our church). In 2019, the Kincadee fire stopped within a quarter mile of the vineyard. Needing to evacuate hotel and casino guests in future fires will also create traffic jams. The photo below shows the Tubbs Fire behind the vineyard. Another photo is attached showing the following day, with the fire burning down through the park.



Second, I am concerned about the **impacts on wildlife**. I have been a part of Shiloh Neighborhood Church for 28 years, and have observed countless wildlife species traversing through the vineyard and Pruitt Creek, or flying overhead.

I have a wildlife trail camera at the church property, and have captured images and videos of coyotes, skunks, raccoons, gray foxes, opossums, and jack rabbits traveling through the area. Additionally, we've observed Great Horned Owls, Red Tail Hawks, Blue Herons, Canadian Geese, bats, and many small birds flying over the vineyard. There is a **de facto wildlife corridor** from Shiloh Regional Park all the way to Highway 101, which passes through the vineyard and our church property. I regularly watch coyotes, foxes, and jackrabbits cross the road from my front yard into the vineyard at dusk. While the vineyard is not the same as wild land, it is easily traversed by these creatures. I hear and see the birds and owls fly from the Regional Park to land in our trees. The added noise and light pollution will undoubtedly affect migration patterns for the wildlife, let alone the impact from physical buildings.

This is a screenshot of a coyote taken from my wildlife camera 165 feet from the property. I have hundreds more videos like this of the species mentioned above.



Third, I am concerned about **flooding**. Our mailbox for our home and church are located on the east side of Old Redwood Highway, so I daily walk over to the edge of the vineyard. In the Winter, during storms, the drainage ditch fills up, as Pruitt Creek cannot handle the water on those days. We already have water back up into our church parking lot out of the ditch, because the creek is full. Development will affect how much water the ground can absorb, and worsen the problem.

Fourth, I am concerned about **increased water usage** from new development, and how that will continue to draw down the water table.

Fifth, I am concerned about the **increase in litter, vandalism, homelessness and drug use** from more people being present 24 hours a day. This area already deals with these issues, but an increase in people being present will further impact our church and residences.

Sixth, I am concerned about the **increase in traffic and noise** and how that would affect those of us who live in the area.

Lastly, I am concerned about how the Casino development would affect our church, which is directly across the street. We are a very small church that serves the community in big ways: we host a food bank distribution that averages over 100 vehicles lining up each week--added traffic will negatively impact our community. We work with at-risk youth, who would now be directly exposed to the negative impacts of gambling. We host numerous recovery groups, including Gamblers' Anonymous and Alcoholics Anonymous.

We would deal with the traffic and maintenance issues of people turning around and loitering in our parking lot (the Casino would be a non-smoking property, so where

would people go to smoke?). **These maintenance issues will directly lead to an increased financial cost for our church, which will in turn negatively impact our ability to provide the key services we are currently offering our community.**

In 2020, the traffic on Old Redwood Highway was lower, and the amount of wildlife skyrocketed. I actually started dreaming that a Native American tribe would have the property and restore it to a status that works with the land. The casino proposal would do the opposite.

Rev. Josh Ratiani
Pastor, Shiloh Neighborhood Church
www.shilohnc.com





From: Padi Selwyn
Sent: Thursday, June 16, 2022 1:46 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

TO: Chad.broussard@bia.gov

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

As co-chair of Preserve Rural Sonoma County, we are writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

We request that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Here are our major concerns:

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought is intensifying, affecting fire, and the water table. Residents in Sonoma County are on mandatory water rationing. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Loss of Aesthetic Quality of Neighborhood Populations near

location - Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the vehicular traffic to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when residents in adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the

following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Thank you for considering our concerns and studying these critical impacts noted above.

Padi Selwyn
6024 Fredricks Rd, Sebastopol, Ca. 95472

PRESERVE RURAL SONOMA COUNTY



PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2022 JUN 22 PM 12:21

June 17, 2022

Sent Via E-mail
chad.broussard@bia.gov

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke:

The Northern California Carpenters Union is responding to Sonoma County's June 8 request for public input to help frame the county's response to the Bureau of Indian Affairs concerning the Koi Nation of Northern California's proposed Shiloh Casino & Resort project on the Tribe's land at 222 E. Shiloh Road.

The Northern California Carpenters Union unequivocally supports the Koi Nation's project as proposed by the Tribe. This project will provide unparalleled opportunity and economic benefits to our members, to the members of the Koi Nation, and to Sonoma County and the communities adjacent to the project.

The Nor Cal Carpenters Union has a membership of over 37,000 skilled craftspeople, making us one of the largest organized voices in the Northern California construction industry. This project will provide family supporting union jobs with benefits including healthcare and pensions to hundreds of our members who live in and around Sonoma County. The project also will provide Sonoma County residents with the opportunity to obtain training in a skilled trade, one that can provide them with the same solid economic future that this project offers to the Koi Nation. The project also will provide more than 1,000 permanent jobs to local residents once it is in operation.

As a union whose members have worked on countless projects in the area, we also have rarely seen a project of this scope that is so well designed to fit into the landscape and respect the natural features of the land. It is clear that the Koi Nation is maintaining its traditional respect for the land and nature at the same time as it creates economic benefits for the county.

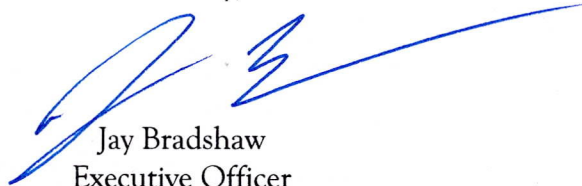
Finally, at its heart this project is about equity for the Koi Nation and its members. For their own selfish reasons, the opposition to the project is seeking to prevent the Koi from deriving economic benefits from their land following an approved federal environmental process.

This is a sorry repetition of the historic injustices done to the Koi people, who have suffered the dispossession of their lands for more than 150 years. This runs absolutely counter to the public policy of Sonoma County, which formed an Office of Equity in 2020 and created a

Racial Equity and Social Justice pillar in the County's strategic plan, with its initial focus on racial equity. As a union whose membership represents a diverse workforce, we support the County's equity policy and the Koi Nation's efforts to obtain economic equity through the Shiloh Casino & Resort project.

For the benefit of working men and women in Sonoma County, for the economic benefits that will accrue to the County overall, and in the interest of upholding the County's equity for the Koi Nation, we urge Sonoma County's full support for the Shiloh Casino & Resort project.

Sincerely,



Jay Bradshaw
Executive Officer
Nor Cal Carpenters Union

From: Casino Opposition - OurCommunityMatters
Sent: Monday, June 27, 2022 2:48 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort & Casino Project

Subject: Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

June 27, 2022

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95492

Dear Director Dutschke,

Our Community Matters is a Nonprofit Mutual Benefit Corporation. The specific purpose of this corporation is to preserve the character and resources of the community and to educate and advocate for the community's responsible growth, safety, environmental and drought awareness and promote responsible wildfire evacuation capacity. In this light we have reviewed the Notice of Preparation of an Environmental Assessment/Tribal Draft Environmental Impact Report from the Bureau of Indian Affairs, Department of the Interior for the Koi National of Northern California Shiloh Resort and Casino Project,

We are requesting the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Our Community Matters is submitting comments on the NOP to inform the Department of the Interior, the lead agency of potentially significant impacts regarding growth, environmental, biological, drought and wildfire evacuation concerns.

Aesthetics – Visitors come to Sonoma County for the aesthetics of this area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate the same aesthetics. This project destroys the beauty of the region, building a gambling casino resort, with buildings, parking lots and structures, artificial light, traffic and congestion and crime, inside a residential area. There are commercial areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased

incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location – Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life, detriment to public safety: impairment during wildfire evacuation, intoxicated driving, crime; residential property devaluation, noise, detriment to residential life activities due to casino resort location across street from two popular public parks, interference with residential transit routes by visitors to the casino. Please study how this decline in property values impacts the owners' equity and financial standing.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly. Traffic noise from Hwy 101 can be heard over 5 miles away at the top of Shiloh Regional Park and the Mayacama foothills.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Please study the additional volume of casino visitors'/employee cars, service trucks and traffic on Shiloh Road will harm public safety while biking, walking, running, and exercising on Shiloh Road. Please study the safety of bike riders during tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of

additional carbon into the residential neighborhoods nearby. Please study the impact on human health for all residents and visitors to the areas adjacent to the casino.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches, and study how many members of these churches will be adversely impacted.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air and into the soils of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood. What is the impact of toxic construction materials deposited in the soils with rain events? How will the drainage waters from the parcel, including the water in the Riparian corridor, be monitored for toxins? How will the water discharge from the site be monitored for toxins?

Crime – Despite denials from the casino communities, data support the fact that crime increases in areas with casinos. Gambling addiction, and the need for a revenue stream to feed this, increases theft. 24 hour bar activity, both alcohol and cannabis, will increase incidents of intoxicated driving; gambling casinos also attract drug dealers, gangs, and prostitution. Please study the incidence of crime around large casinos and the impact on the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife habitat and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf> Please study the risk to customers on this site from dam failure due to earthquake, flood or other triggering events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to

the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high fire risk area or a residential family neighborhood. The detrimental impact on the existing residential communities and small businesses is too great. This is the wrong location for a business like this. Please study the number of residents, school children, visitors to Esposti Park and Shiloh Regional Park, Churches, and small businesses that will be impacted by an overwhelming casino resort at this location.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increased drunk/intoxicated drivers in a residential family neighborhood/community; please study the incidence of DUI during daytime hours and evening to morning hours; please evaluate the number of residents at risk who work normal daytime hours, evening and night shift hours; please evaluate the number of school children going to/ returning from the nearby schools; please study the number of nearby schools that have events at Esposti Park and Shiloh Regional Park and the risk to their public safety and health with a casino resort across the street.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the drought, and the impact of building and operating a business that will consume massive amounts of water out of the local aquifer.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and to the visitors/ employees/ vendors/ and service personnel of this proposed project. Please study the evacuation strategy for a sudden catastrophic event for the casino resort and surrounding residential communities.

Economic Impact - Please study the economic impact of another casino resort on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural areas that the Dept of Interior originally designated as locations suitable for casinos, away from urban and residential areas.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please thoroughly study the full impact to the local economy, including taking business away from the true local indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair emergency response; please study how the increase in traffic will add to the duration of gridlock as well.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current

population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards/ loss of green belt space

Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods.

Fire Season is year-round and increasing – Please study the number of days of **unhealthy air quality** (NOAA) from 2017 to the present **due to wildfire smoke** in Sonoma County. Please study the number of days annually when the public is advised to stay indoors and/or is cautioned about working or exercising outdoors due to wildfire smoke. Please study how smoke and poor air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the decrease in visitors to the “Hwy 101 corridor of casinos” will be on a 4th casino resort’s revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Floodway- In prior years, Pruitt Creek has flooded, overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff instead of absorption into the ground.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park, habitat for predator birds, wild birds, coyote, fox, possum, skunks, racoons, bobcats and a variety of reptiles and

amphibians who venture into the vineyard and Pruitt Creek in search of food and water. These beneficial animals also are predators for a rodent population that will overtake the area when their natural habitat is destroyed. Pruitt creek is designated a critical habitat, a Riparian corridor, and is an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife. Please study the increase in rodents and rats when the beneficial predators are chased out of their habitat.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/wildfire risk outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. Please study if these power outages will adversely impact the established residences/ schools and small businesses with the addition of a casino resort at this location.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- A casino resort is an improper use of the Land Intensive Agricultural zoning for the parcel and is totally out of character with the local environment. The casino project will be replacing valuable vineyard with concrete and heavy commercial activity. The loss of valuable vineyard land in Sonoma County should not be allowed because this quality of land/ vineyard potential is limited to specific areas in Sonoma County. The vineyards are the foundation of the Sonoma County Wine Country tourism business. The loss of scenic vistas and loss of aesthetic quality in this area should not be allowed. This is one of those special vineyard locations. To replace this land with an estimated 10,000 to 20,000 visitors a day, plus employees, vendors, delivery drivers, should not be allowed. Please study the impact of loss of valuable vineyard/ agricultural land on the residents and visitors who come to this area to see vineyards and open space and enjoy the special character of Shiloh Regional Park.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and the public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local

indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels, and degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on the local area and on downstream water flows.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months every year, and for slightly shorter times during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current level of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact the stress and welfare of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space - Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from points all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on the west- facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton - Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space "rural" quality and vineyards, even though it is close to ORH. Please study the impact of loss of venue along Faught and Shiloh Roads for these athletic and outdoor events on the local small businesses.

Loss of Open Space- The proposed casino site is on open space/ vineyard land with a Riparian Corridor that is designated as protected habitat for the Valley Oaks and for wildlife. Please study the impact of the casino project's long term continuous day and night operation on the animal and plant habitat in the surrounding neighborhoods, Esposti Park and Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. Please study the impact of continuous noise, sirens, alarms at all hours on the residents' many pets and their mental health and stress levels, which will certainly exacerbate the elevated stress levels of the neighborhood residents.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks. Please study the number of activities that have been organized at Esposti

Comment Letters

Individuals

September 19, 2021

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 SEP 27 PM 3:22

Mr. Chad Broussard
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Broussard,

Please add Lynda Williams to the Fee-To-Trust service list regarding the Koi Nation Fee-To-Trust acquisition in Sonoma County currently in process. If possible, please send a CD of the National Environmental Impact Statement so that I can make a thorough review and comment appropriately.

Sincerely,



Lynda Williams
5801 Mathilde Drive
Windsor, CA 95492
lyndagw@hotmail.com
707-849-4874

[EXTERNAL] RE Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Kristine Hannigan <kristine.hannigan@gmail.com>

Tue 9/21/2021 6:55 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Boussard

Please add Kristine Hannigan to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

Kristine Hannigan
6166 Lockwood Dr.,
Windsor, CA 95492

[EXTERNAL] Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Cory Thomas <corythomas731@yahoo.com>

Thu 9/23/2021 9:41 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

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Dear Mr. Broussard,

Please add Cory Thomas to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

Cory Thomas
349 Gazania Ct.
Santa Rosa, CA. 95403
707-975-1509

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

Lynn R. Darst

2021 SEP 27 PM 3: 21 5845 Mathilde Drive

Windsor, CA 95492

707 318-9917

Backpackers_darst@sprynet.com

September 23, 2021

Mr. Chad Broussard
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: REQUEST TO BE ADDED TO THE SERVICE LIST FOR THE KOI NATION FEE TO
TRUST IN SONOMA COUNTY

Dear Mr. Broussard:

Please add my name, Lynn Darst, to the service list for the Fee to Trust
transaction of the KOI Nation's proposed Casino in Sonoma County near the town
of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may
make a comment.

Thank you!



Lynn R. Darst

September 26, 2021

Mr. Chad Broussard,
Bureau of Indian Affairs, Pacific Regional Office,
2800 Cottage Way, Sacramento, CA 95825

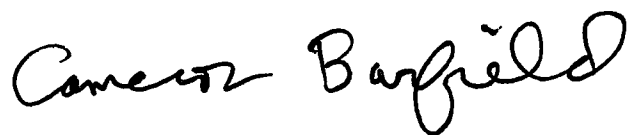
RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Cameron Barfield to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

A handwritten signature in black ink that reads "Cameron Barfield". The signature is written in a cursive, flowing style.

Cameron Barfield
5820 Mathilde Drive
Windsor, CA 95492
707-687-5665
cameron_business@sonic.net

[EXTERNAL] RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Lance Cottrell <lance@lancecottrell.com>

Mon 9/27/2021 11:35 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

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Dear Mr. Broussard,

Please add Lance Cottrell to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

Lance Cottrell
853 Shiloh Glen, Santa Rosa, CA 95403
571-294-5374
lance@lancecottrell.com

--

Lance Cottrell - lance@lancecottrell.com
<https://FeelTheBoot.com>

Listen to the Feel the Boot podcast at <https://FTB.bz/podcast>

[EXTERNAL] Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

abjoh3@aol.com <abjoh3@aol.com>

Fri 10/1/2021 9:40 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

1 October 2021

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Abby Fletcher to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the Town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank You,

Abby L Fletcher

5850 Leona Court, Windsor CA 95492

4155053605

Abjoh3@aol.com

[EXTERNAL] Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

James Fletcher <james287@aol.com>

Fri 10/1/2021 9:38 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

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1 October 2021

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add James Fletcher to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the Town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank You,

James D Fletcher

5850 Leona Court, Windsor CA 95492

9259844219

James287@aol.com

October 1, 2021

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT -4 PM 5:35

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Joan Chance to the service list for the fee to trust transaction of the Lot Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you,



Joan Chance
141 E. Shiloh Road
Santa Rosa, CA 95403

(707)695-3587

joanchance@comcast.net

[EXTERNAL] Service List Request**Anthony Sarto <anthonyfab777@att.net>**

Sat 10/2/2021 7:11 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

10/2/2021

Mr. Chad Broussard,

Bureau of Indian Affairs, Pacific Regional Office,

2800 Cottage Way, Sacramento, CA 95825

RE: Request to be added to the service list for the KOI Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Anthony Sarto to the service list for the fee to trust transaction of the Koi Nations' proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

Anthony Sarto

5830 Gridley Drive, Windsor, CA 95492

707-494-5841

Anthonyfab777@att.net

[EXTERNAL] Request to be added to the service list for th Koi Nation Fee to Trust In Sonoma County

Georgianne <gboissier@comcast.net>

Sat 10/2/2021 3:31 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

Please add Georgianne Boissier to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!

Name: Georgianne Boissier

Address: 153 Barrio Way, Windsor, CA. 95492

Phone Number: 510-028-6027

Email Address: gboissier@comcast.net

Sent from my iPad

DECRMS

October 5, 2021

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT -8 AM 11:01

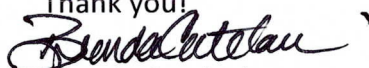
RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Brenda Catelani to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!



Brenda Catelani

5842 Leona Court, Windsor, CA 95492

707-293-3463

bmcats@pacbell.net

DECKMS

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT -8 AM 10:59

October 5, 2021

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Mark Catelani to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you!



Mark Catelani

5842 Leona Court, Windsor, CA 95492

707-293-3363

mpcat@pacbell.net

[EXTERNAL] Request to be added to service list for Koi Nation's request for fee to trust transfer of property

Anne Keck <akeck@public-law.org>

Tue 10/5/2021 5:10 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard:

The Koi Nation is proposing to build a casino and hotel right next to my residential neighborhood on the property located at 222 E. Shiloh Road, Santa Rosa, CA 95403. I am strongly opposed to the proposed development for many reasons, including for environmental concerns, traffic congestion and noise pollution, fire evacuation problems in the area, and health and safety issues.

By this email, I **request to be added to the service list** for all actions requested by the Koi Nation aimed to develop that property into a casino and hotel. Specifically, I would like to receive service of all documents related to the Koi Nation's request for Fee to Trust transfer of that property, including all NEPA review documents and records of other governmental proposed actions and/or approvals.

Please email me a copy of all requested documents to akeck@public-law.org, and send an online link to the NEPA review to enable me to make a comment.

Thank you, in advance, for your assistance. Best regards, Anne

Anne L. Keck

Keck Law Offices

228 Windsor River Road, Suite 507, Windsor, California 95492

Email: akeck@public-law.org | Website: www.public-law.org

Tel: (707) 595-4185 | Fax: (707) 657-7715

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PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT 13 PM 2:20

Aaron Ziskin
1136 Poppy Drive
Santa Rosa, CA. 95404
Phone 707.292-1369
aaronziskin16@gmail.com

October 6, 2021

Mr. Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard

Please add Aaron Ziskin (address above) to the service list for the fee to trust transaction of the Koi Nations proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the review if possible or an online link so that I may make a comment.

Thank you


Aaron Ziskin

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT 13 PM 2:21

TylerZiskin
2749 Walnut St.
Denver, CO 80205
Phone 707.292-9956
tziskin@gmail.com

October 6, 2021

Mr. Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825


RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard

Please add Tyler Ziskin to the service list for the fee to trust transaction of the Koi Nations proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the review if possible or an online link so that I may make a comment.

Thank you


Tyler Ziskin

Denise Ziskin
5862 Leona Court
Windsor, CA. 95492
Phone 707.292-0779
d.ziskin@comcast.net

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT 13 PM 2:21

October 6, 2021

Mr. Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard

Please add Denise Ziskin to the service list for the fee to trust transaction of the Koi Nations proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the review if possible or an online link so that I may make a comment

Thank you

Denise Ziskin



PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS

2021 OCT 13 PM 2:22

Don Ziskin
5862 Leona Court
Windsor, CA. 95492
Phone 707.292-0779
donziskinlaw@comcast.net

October 6, 2021

Mr. Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard

Please add Donald Ziskin to the service list for the fee to trust transaction of the Koi Nations proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the review if possible or an online link so that I may make a comment.

Thank you



Donald Ziskin

[EXTERNAL] Request to be added to interest party list for Koi Nation's application for fee to trust transfer of property

betsy mallace <betsymallace@yahoo.com>

Thu 10/14/2021 5:02 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

The Koi Nation is proposing to build a casino and hotel in a residential neighborhood bordering my town of Windsor, CA. The property is located at 222 E. Shiloh Road, Santa Rosa, CA 95403. It is less than 2 miles from my personal residence. I am opposed to the proposed development for many reasons, mostly environmental concerns, such as the lost of agricultural lands that are natural firebreaks, a decrease in emergency evacuation routes, increased green house gas, and many other health and safety issues.

I am requesting to be added to the interested party list for any/all actions requested by the Koi Nation aimed at developing this property. Specifically, I would like to receive service of all documents related to the Koi Nation's request for Fee to Trust transfer of that property, including NEPA review documents and records of other governmental proposed actions and/or approvals.

Please email me a copy of all current documents. I would also appreciate an online link to the NEPA review to enable me to make public comment.

Thank you, in advance, for your assistance.

With best regards,

Betsy Mallace

Windsor, CA 95492

betsymallace@yahoo.com

707-836-1576

RECEIVED

OCT 28 2021

DCN: IA00010964
Executive Secretariat - Indian Affairs (ESIA)

October 15, 2021

Mr. Bryan Newland
Assistant Secretary—Indian Affairs
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240
MS-4660-MIB

Dear Secretary Newland,

We are writing you as concerned citizens and residents of Sonoma County, California. We recently learned of the intention of the Koi Nation to petition your office for the land parcel at 222 Shiloh Road, Windsor, CA, to be placed into a federal trust. We ask for you to contemplate the following factors in your ultimate decision of whether to approve or deny this request.

The intention of the Indian Reorganization Act and Fee-to-Trust process was enacted with good intentions to restore the ancestral lands of tribes that had been displaced throughout the past centuries. This program was used in good faith by the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians, to establish sovereign territory in Sonoma County, based off of legitimate claims of ancestral presence in the area. The Koi Nation originated in Clearlake, Lake County, California and therefore objectively fails the initial test of a historical connection to the 64-acre parcel in question on 222 Shiloh Road. To overlook this critical point is to categorically ignore the precedent set by all the Indian nations who have arduously and patiently petitioned the Department of the Interior and Bureau of Indian Affairs in good faith. The Koi have demonstrated twice before their disregard for the rules and process by unsuccessfully attempting to ram land trust and casino development projects into other Bay area communities of Oakland and Vallejo. This precedent is critical to understand that the same reason behind the dismissal of their applications then is valid now for this misguided third attempt for a development in Windsor. While it is sad to see the Koi people being so poorly counseled, and seemingly taken advantage of by predatory 'advisors', that does not absolve them of the same duty to prove historical ties to the actual piece of land in question.

Beyond the objectively and categorically clear facts of no historical ties, we also want to highlight to the BIA several additional realities locally which make this proposed development even further misguided. Understanding Washington D.C. is far removed geographically from the area it is imperative the BIA appreciate the poor logistics and already fragile situation in the proposed development area. Sonoma County is already in a severe drought with most of the municipalities already implementing water rationing and conservation programs. Vineyards have proven to be one of the best firebreak defenses in Sonoma County and this fact is confirmed and supported by University of California-Davis, the leading academic authority in vine agriculture and county firefighting experts. The vast majority of the 64-acre parcel is currently under vine and serving as a firebreak to the surrounding residential neighborhoods, so the proposed development would be a giant step backwards by removal of the vineyard fire protection and replacement with a giant flammable structure. Lands within one mile and adjacent to 222 Shiloh Road were consumed in wildfires in 2017 (Tubbs), 2019 (Kincade) and even last year, 2020 (Glass), albeit slightly further away. The Tubbs and Kincade fires prompted middle of the night, emergency evacuations of residents in the surrounding community. There are clear images of gridlock traffic for hours on US 101 during these evacuations, so imagine the chaos and threat to life from thousands of casino guests and staff compounding to the evacuation and clearly threatening the ability of local residents to make their egress. A potential additional complication would arise from the proposed development of an assisted living, elderly care residential facility, just west of the proposed site, at the south-east intersection of the Shiloh road and US 101 interchange. Given these factors it is not difficult to see how impossible it would be to even reach the US 101 onramps with this additional traffic on two-lane, Old Redwood and Shiloh Roads.

There is a clear precedent that public safety in these moments is dependent on clear, unobstructed and low-density roads to allow residents to flee and first responders to access the affected areas. To grant the Koi a sovereign territory in the middle of this high-risk area, where no zoning laws or other standard public safety protocols are applicable, is to subordinate all reasonable safety expectations of the other residents to the financial interests of casino investors. This would be an unconscionable betrayal of public trust in government institutions when that trust is arguably already at an all-time low. The residents and taxpayers of Sonoma County deserve full transparency and input towards any decision that affects public safety in an area which has consistently become an almost annual wildfire flashpoint and evacuation zone.

We humbly request your consideration of these critical public safety factors in deliberating the Koi request for a land trust at 222 Shiloh Road. It is not an exaggeration to state that lives may be saved or lost depending on the outcome of your determination.

Sincerely,

The image shows two handwritten signatures in blue ink. The first signature is a stylized, cursive 'D' followed by 'H', representing Daniel Heidenreich. The second signature is a more flowing cursive script that reads 'Camilla Heidenreich'.

Daniel Heidenreich & Camilla Heidenreich
Residents, Parent and Community Member of Sonoma County

[EXTERNAL] Koi Nation Casino Proposal

Sean Harrell <seaharrell@gmail.com>

Thu 11/11/2021 6:38 PM

To: Gaming, Indian <indiangaming@bia.gov>

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Hello,

I would like to voice my opposition for the proposal from the Koi Nation to build a Casino/Resort complex in Sonoma County. The proposed Casino has a number of flaws that are documented. Firstly the Koi Nations historic tribal lands are not located in the proposed Casino location or in Sonoma County. They are located in Lake County CA, over an hour by car or 30 miles in straight line, over some very large mountain ranges in a different geographic area. They are infringing on the tribal rights of the local Pomo and Miwak tribes (Graton, Lytton, Dry Creek, Kashia, Cloverdale). Along this logic the any tribe in California or even the country could start a Casino anywhere they please.

In addition to infringing on other tribes land Sonoma County and California have had unprecedented natural disasters. The proposed location for the Casino has been evacuated twice in the last four years from Wildfires and with it's location in residential area this is a very real concern for everyone who live, recreates and works in the area. The region is going through a significant drought as well. We have to ration water in Sonoma County, upwards of 50% reduction of water usage. This is a concern that regional policy makers make in planning our resources and the tribe if the land goes into trust will not have to abide by.

Please feel free to reach out if you have any questions.

Regards,

Sean Harrellseaharrell@gmail.com

707-480-6322

[EXTERNAL] request for Fee to Trust document

MEREDITH STROM <mandmstrom@comcast.net>

Tue 9/28/2021 9:21 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

November 28, 2021

RE: Request to be added to the service list for the Koi Nation Fee to Trust in Sonoma County

Dear Mr. Broussard,

Please add Meredith Strom to the service list for the fee to trust transaction of the Koi Nation's proposed casino in Sonoma County near the town of Windsor.

Please send a CD of the NEPA review if possible or an online link so that I may make a comment.

Thank you.
Meredith Strom
5825 Mathilde Dr.
Windsor, CA. 95492
707-836-9172

mandmstrom@comcast.net

[EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Cameron Barfield <cameron_business@sonic.net>

Sun 6/5/2022 10:02 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

 1 attachments (22 KB)

My response to the request for input for the environmental impact report.doc;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Mr. Broussard,

As the Bureau of Indian Affairs Pacific Region Environmental Protection Specialist I urge you to reject the Koi Nation Shiloh Resort and Casino Project application to be put into trust. Please read my attached Word document that I am mailing to Ms. Dutschke. It will give you some of the pertinent reasons.

Sincerely,

Cameron Barfield

5820 Mathilde Drive

Windsor, CA 95492

707-687-5665

RE: Koi Nation Shiloh Resort and Casino Project

June 7, 2022

Ms. Dutschke,

Times here in my neighborhood are changing and not for the better. When we purchased our home here in 1999, after many years of hard work and saving and searching for a home in a quiet country setting we could afford, we never imagined the beautiful vineyard just 5 houses down the street from our home would be torn up to make way for a giant casino. A giant edifice of greed that would displace not only grapes, wild turkeys and jackrabbits, foxes and quail, but also the peace loving people of our neighborhood. It would also congest our peaceful two lane roads we love so much here, making evacuation impossible in times of fires which are becoming more frequent. The casino will bring to our neighborhood bright, sleep disturbing car and motorcycle lights ending our enjoyment of dark starry nights. Also disturbing our sleep, the loud cacophonous noise of drunk people screaming and laughing in the casino parking lot while they race their car and motorcycle engines to make them roar and their tires squeal. Most disturbing of our sleep will be the sounds of gunshots as drug deals go south and gang fights break out and robberies occur in the casino parking lot. Under the oak trees lining East Shiloh road there will be hookers. Our homes will be burglarized. The cars that we park in our driveways and on our once safe streets violated--catalytic converters stolen. All these kinds of disturbances and more that will continue 24 hours a day, 7 days a week, 365 days a year.

The character near my neighborhood is already changing for the negative. Lots of for sale signs are already on display all along East Shiloh Road. There haven't been this many listings on East Shiloh Road in the years I've lived here. If the casino is put into trust I am sure there will be lots of for sale signs put up on the streets in Oak Park: my neighborhood, which is right next door to the casino. The casino will lower Oak Park property values since there will be so many properties for sale and sales will be slow as the neighborhood will be undesirable to most buyers (seniors, families) due the casino right across the street. As properties values decline some homes will be bought up and turned into rentals and Air B&B's that bring loud parties and lots of trucks, cars, fights, drugs, drunkenness, prostitution and theft. These long term rentals and Air B&Bs will drive down the value of the neighborhood even more as more homeowners sell out so they can try to find a place to live in peace, quiet and safety. As home sales in Oak Park occur, the many neighbors who I have gotten to know over the years by first name, who I see when walking around Oak Park--owners who take care of and improve their homes, with whom I share my homegrown veggies--and they with me, will disappear. These friends--proud owners who maintain their homes to high standards because they take pride in it's appearance--will be replaced by distant lazy uninvolved slumlords who won't maintain their property to the standards of a concerned owner who lives in his own home. And from my personal experience during 30 years of property management I know renters or Air B&Bs, who have no vested interest in maintaining or improving a rental property, do not pull weeds or pick up trash in the yard, trim trees and bushes, fertilize and mow the lawn. They certainly won't water the lawns or plants so the lawns and most of the plants will die.

In short my Oak Park neighborhood will become a crime ridden environmental wasteland. Trashy, run down--ugly. It will no longer feel safe to me or anyone who lives here in Oak Park. With newly installed security bars on doors and windows we will be prisoners in our own homes--our safety, peace and quiet beauty, already stolen from us. Our homes devalued and lives violated 24 hours a day, 365 days a year, by more crime and bussed in crowds of gambleholics. I must add here in case you haven't thought about it but those big slow stinky noisy busses will block narrow two lane East Shiloh Road when a fire occurs making evacuation to Hwy 101 impossible for Oak Park residents. And don't forget all the cars and trucks from the guests at the casino and the resort and also the employees. How will they evacuate? East Shiloh Road was a parking lot with traffic backed up all the way from Hwy 101 when we tried to escape from the Tubbs fire in 2017. What do you think will happen during a short warning fire evacuation with this casino resort adding thousands to this area all trying to escape via a single two lane country road?

The people of Sonoma county would never permit such a project as evidenced by the signs all along our Sonoma County country roads in front of vineyards saying "Sonoma Sustainable". This commitment to our county's environment was re-affirmed by the resolutions against the casino recently passed unanimously by the Windsor town council and the Sonoma County board of supervisors. The only thing the Shiloh casino will sustain is a greed driven black hole of environmentally destructive consumption of what we value most highly here in Sonoma County: the natural, beautiful, quiet country charm of our county--a real thing of priceless value this county is striving to preserve for generations to come. All the mitigations mentioned in your notice of the preparation of an environmental assessment are only window dressing and will not abate the very real, monstrous environmental desecrations described in this, my letter, that foretells only a small portion of the immense losses to me and my community: Oak Park, Larkfield-Wikiup, Windsor, Santa Rosa, and Sonoma County... if you put this project into trust.

From: Rachel Jackson

Sent: Thursday, June 9, 2022 1:36 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Comments re: Koi Tribe Plans for Casino Site outside of Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Per the [Sonoma County press release](#):

I'm writing to express my concern and OPPOSITION to the Koi Tribe Plans for a casino site outside of Windsor, CA. I'm a resident of Sonoma County and see the filth, traffic, and questionable people that casinos bring to neighborhoods that they surround. Additionally, Sonoma County already has a casino < 18 miles away from the proposed plan. We do NOT need more casinos!

My vote would be for the 68.6 acres to be used for a green space, including more parks, hiking trails and dog-friendly areas. This county does NOT need more traffic and pavement!

I appreciate your request for public comment and hope this project is NOT approved by the state.

Sincerely,
Rachel Jackson
17345 Vailetti Dr.
Sonoma, CA 95476

From: Michael Donovan
Sent: Monday, June 13, 2022 7:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino On Shilo And Old Redwood

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This is absolutely unacceptable. We live in Windsor CA. We already have a shortage of water. We are saving water by collecting water in buckets when we shower, save rinse water with dishwashing etc. We cannot build a Casino. The water usage would be just be just way too much.

From: l caruso

Sent: Tuesday, June 14, 2022 6:02 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>

Subject: [EXTERNAL] Koi Casino

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Please. NO CASINO at Old Redwood Hwy and Shiloh Rd in Windsor/Santa Rosa. This is a terrible, irresponsible idea for many reasons including the following:

- Loss of a large fire break.
- In the event of an evacuation this would add a tremendous amount of traffic to the already congested route.
- Way too close to several residential areas.
- Negative environmental impact from increased traffic and huge amounts of water used by this monstrosity.

I've had the unpleasant experience of being evacuated from my home due to fire in this area and the traffic was incredibly bad. Our feelings about adding extra traffic are no joke. We all still panic when we smell smoke.

Please do the right thing and find a more suitable location for this casino. Lake County makes more sense given this tribes history.

Letitia Caruso
Windsor CA

From: James Gilbert

Sent: Tuesday, June 14, 2022 1:50 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: huffman.ca.scheduling@mail.house.gov <huffman.ca.scheduling@mail.house.gov>; senator@feinstein.senate.gov <senator@feinstein.senate.gov>; senatoralex_padilla@padilla.senate.gov <senatoralex_padilla@padilla.senate.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Dear Mr. Broussard:

I do hope that part of your consideration of this poorly conceived project includes the impact of the project on adjoining residential neighborhoods and playgrounds.

The proposed project area of Shiloh Road has inadequate traffic patterns for such a large scale project. The project will largely use the Shiloh Road exit off Highway 101. That exit, which is the main access to the western portion of Windsor, main access to a local regional park, and main access to large shopping center, is one lane. This one lane is adequate for current use, but the addition of this massive project alongside existing residences and on the very tight road to one of our regional parks is a traffic nightmare for the future.

Putting aside my objections to the casino itself, any large scale entertainment proposal for this site is unworkable. We would have the same problem with a theme park or Six Flags. This site is residential/agricultural in nature, currently used for vineyards.

I ask you to give careful consideration to the enormous negative impact on the Town of Windsor and its residents. I support the need for *actual* local tribes to seek casino licenses, and we have two casinos within a 20 minute drive of this location. But neither of the casinos are in residential neighborhoods. Also, the Koi *are not* a Sonoma County tribe. They should not be permitted to encroach into another tribe's sovereign territory.

I note that this was a clever but disingenuous purchase by the KOI. They kept it silent, so as to avoid local uproar, and they made sure that the project would lie adjacent to, but beyond the town limits of Windsor. However, do not be misled that this "county land" is somewhere far afield from our playgrounds and neighborhoods. To the contrary it is right in the middle of an active corridor for Windsor residents and visitors to our regional park.

Furthermore, we are in a drought. We are trying hard to conserve this precious resource. These types of development are awful for our climate change influenced

environment, and will destroy the agricultural feel and scenic beauty of our small part of Sonoma County.

Please reject this proposal. I request that my name and email address be added to all future mailings or announcements for this project.

Thank you for your attention to this matter.

Sincerely,

James Gilbert and Michael Pollock
409 La Quinta CT.
Windsor, CA 95492

From: Ginna Gillen

Sent: Tuesday, June 14, 2022 1:31 PM

To: tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>; Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: ourcommunitymatters2@gmail.com <ourcommunitymatters2@gmail.com>

Subject: [EXTERNAL] Objection to Koi Nation Shiloh Resort and Casino Project

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I want to go on record as being very strongly opposed to the proposed Koi Nation Shiloh Casino and Resort Project.

As a long-time Windsor resident, I want the parties considering this proposal to understand that the negative impact of this development is real.

My family was forced to evacuate our home in the Kincaid fire. Even though we were given hours to leave the area and we did not wait until the last minute, the traffic on Highway 101, the only escape route, was backed up for miles and miles, causing corresponding jams on the feeder roads. Wildfire danger in the Shiloh area continues to be a threat. The effect of feeding the additional number of vehicles anticipated to be at the casino would be devastating and potentially fatal.

I could go on and on about all of the other reasons this is a really bad idea...lack of water, traffic on local roads, proximity to an elementary school and in a residential area. And beyond all this, the Koi Nation has no historical connection to this land and, therefore, no right to victimize the current residents of our neighborhood.

Virginia Gillen
9559 Ashley Drive
Windsor, CA 95492

From: Carrie
Sent: Tuesday, June 14, 2022 4:10 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project"

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Hi.
My name is Carrie Marvin 237 La Quinta Drive Windsor CA

I am extremely concerned about the KOI project. We have had 2 mandatory evacuations in the past few years and have voluntarily left our home due to smoke and fire several other times. We have had massive fires in our neighborhoods, mere minutes from where this site is. Our house had \$50k worth of smoke damage.

Traffic is frightening when you are fleeing from fires and to add more people in who don't live there is not going to be beneficial as we struggle to leave. It took neighbors a lot of time to evacuate during Kincade. I left sooner and I had neighbors who said they were stuck for a long time trying to get to the freeway. I can't imagine all the people trying to leave along with another 1000 or more cars from that one small area- it's unimaginable.

We already take our 3 minute showers and replaced our lawn with bark and now you want to bring in a hotel for MORE people to access the water we don't have?
We have a casino 15 minutes south and 15 minutes north of us. The KOI have no ties to Windsor or this location. My understanding is they are a Lake County tribe.
Why native americans who should love our land would want to come to an area besieged with fire and drought and build on it, makes no sense to me.
This is a quiet neighborhood. IT IS IN A NEIGHBORHOOD. This is not somewhere by itself. It will absolutely impact the people who live there. So rude to put a casino right in a quiet neighborhood right across from a park and ballpark where families come to play. I just cannot believe this is even being considered.

This is the WRONG location for a casino. I already had 2 neighbors in my neighborhood sell because they are so concerned with what is happening here and worried this would affect their housing prices. this was a conversation with them. Not one person I have spoken with has thought this was a good idea.
If the tribe wanted to build some homes for tribe members I would understand that. To have a casino and hotel using up our resources and adding thousands of people to our area is the WRONG thing.
Please stop this project now.
I will be another to sell if this project goes through because I will not take my life in my hands because of more hotels and casinos when I need to leave due to fire. I can't take that chance with my family's life.

Carrie Marvin

From: Stefan and Kathy

Sent: Tuesday, June 14, 2022 2:41 PM

To: tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>; Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Concerns About Proposed KOI Casino in Santa Rosa

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Dear Representative,

I am deeply concerned about the proposed KOI Casino to be built off of Shiloh Road in Santa Rosa. I am a 20+ years resident of the neighborhood, living only 1/2 mile from the proposed site.

My concerns are as follows:

- **Increase in traffic** - after having lived through the recent fires that forced us to evacuate our home, I am concerned about the traffic jam such a facility would cause during a mass evacuation. As I write this, there are new apartments in the process of being built just adjacent to the proposed site on Shiloh Road that will also be impacting the traffic in the intersection of Old Redwood and Shiloh. Please have an in-depth traffic study performed prior to making a decision.
- **Increase in crime** - the area surrounding the proposed project is residential. Families with all ages of children live within yards from the proposed site. Please look closely at how casinos affect the safety of neighborhoods so close to them. Look at the statistics of increase in drunk driving incidences, home invasions, drug use, etc.. The type of people drawn to casinos, the alcohol/drug use, and prostitution would be just outside our front doors. Would you want to raise your children across the street from a casino? How will the casino affect the local Shiloh and Eposti parks? These neighborhood parks are right outside the proposed casino's doors, visited by hundreds of families every day.
- **Noise** - casinos operate 24 hours a day. Lights, music, cars all creating noise that will affect our quiet neighborhood. Please look closely to how a casino will negatively impact the quiet neighborhoods surrounding the project.
- **Water Conservation** - we are all conserving water. How will a project of this magnitude affect our water tables? As I mentioned before, already we have the construction of new homes/apartments in the surrounding area that will require a share of the water. How is a project of this size sustainable?

Please research carefully. I, and my neighbors, are extremely concerned and are asking for your thoughtful consideration and diligent research to help prevent this project from moving forward.

Thank you,

Kathy Parnay

190 Barrio way

Windsor, CA

From: Elizabeth Acosta

Sent: Wednesday, June 15, 2022 12:22 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Environmental Assessment - Sonoma County CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Sent via email to: chad.broussard@bia.gov

Please note: please redact our email address prior to publishing this letter on the internet, if needed or required.

We wish to join neighbors and native peoples residing in Sonoma County to express OPPOSITION to any and all efforts by the Koi Nation, a federally-recognized Native American tribe, to have land in an unincorporated area of Sonoma County taken into trust for the Koi Nation in order to build a massive casino resort adjacent to a residential neighborhood and just beyond the boundaries of the Town of Windsor.

While we understand the need and intent of federal laws designed to recognize and protect the sovereignty of indigenous people, we are strongly opposed to the Koi nation's intentions for the entrusted land they seek. Sonoma County is too small a county to add another Vegas-style casino; it will have a detrimental impact on surrounding neighborhoods, have significant negative environmental impacts on the area especially given the recent history and ongoing risk of wildfires and drought in Sonoma County. Climate change effects are stressed to us constantly by our political leadership. How can a development of this size—which invites overuse of natural resources like water, stresses the local infrastructure designed for agricultural and low-density residential use, and increases the demands of public services like fire, police, public works—be sanctioned?

We believe a 24/7 casino is not a good “fit” for this Sonoma County agricultural and residential neighborhood.

Most concerning is what appears to be Koi nation's attempt at “reservation shopping,” according to the Chairman of Sonoma County's Federated Indians of Graton Rancheria, Greg Sarris. In his statement opposing their intentions, chairman Sarris recounting of the Koi nation's history and intentions are both frustrating and enlightening:

- “The consensus among ethnohistorians is that the Koi Nation's ancestral roots are in the Lower Lake area of Lake County. In fact, the Koi Nation was previously known as ‘Lower Lake Rancheria,’ a reflection of its geographic and cultural ties to the area, but changed its name in 2012, amid prior attempts to acquire a gaming site in the Bay Area.”
- “The Koi Nation has never been associated with Sonoma County, linguistically or culturally, as a people indigenous to its landscape. The Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here.”
- “The Koi Nation's attempt to push through a proposal to jump into other tribes' territory is wrong. Moreover, this is not the Koi Nation's first attempt at reservation shopping. In the early 2000s, the Koi Nation unsuccessfully attempted to acquire a reservation and build a casino near the Oakland International Airport. Then in 2014, the

Koi Nation proposed a reservation and casino on Mare Island in the City of Vallejo, again failing.”

- “This effort ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game.”

We have many other concerns that pose a significant risk to the altering the local neighborhood and living conditions, including:

- **Loss of Open Space/Greenbelt and Wildfire Risk:** this location is on land that is on the urban/wild interface and will remove agricultural land that helps form a fire “boundary” around the neighborhood that can help slow or inhibit spread of embers that increase wildfire risk. The area has already been threatened by at least two wildfires in 5 years.
- **Proximity to Residential Neighborhood, Churches, Schools:** the activities that will occur at a 24/7 casino are not conducive to residential zoned areas which are adjacent to the proposed entrusted land. Residential areas are designed to create an environment that seeks to decrease noise, traffic, vehicle/pedestrian contacts that make the areas safe for all ages, esp. youth and the elderly that use sidewalks to recreate and travel.
- **Infrastructure Roads:** the area is designed for residential uses; roads and other infrastructure were not designed for the projected daily visitors. The ability of the Town of Windsor to absorb impacts of traffic/vehicle accidents, crime, medical emergencies, etc. due to the high volume of tourists expected, and concentrated on the property, will greatly outstrip resources of the small town of Windsor which is already facing a structural deficit in funding basic public safety, public works, and traffic management services.
- **Negative Ecological Impact:** given the proximity to open space and a County regional park, the impact on the natural environment due to light pollution, noise, traffic, greenhouse gas emissions, and water use cannot be mitigated given the projected trips/use by visitors to the casino. These same negative impacts are not conducive to adjacent residential living.
- **Drought/Water Availability/Mandatory Water Rationing:** given climate change and the resulting record setting heat and increased wildfires which are exacerbated by years-long drought pose serious threats to the local environment and residents who are already experiencing mandatory water rationing. The water needed to service the proposed development puts increased stress on unpredictable and diminishing water resources. A development like this undermines the local governments’ ability to create coordinated and thoughtful development plans that consider natural resources. A development such as this on land that is taken into trust removes any influence of local governments to control and manage natural resources.
- **Impact of Ignoring Zoning Restrictions/Land use:** we join the Town of Windsor’s expression of formal opposition to the Koi nation proposal at 222 E. Shiloh Rd. The Town has shown support for other local tribal developments in or around the Town of Windsor but finds that this Koi nation proposal is inconsistent with current land use designations.
- **Public Safety/Emergency Response Time:** The land at issue is in an unincorporated area of Sonoma County but immediately adjacent to the Town of Windsor boundary. In an emergency, resources and mutual aid will likely be sourced from the Town. The Town is unable to fund an increased need for services that attract a large, concentrated number of visitors much like what has occurred in coastal communities whose

emergency response services are used mostly by tourists to the financial detriment and burden of local residents.

- Greenhouse Gases: our local, state, and federal governments consistently stress the impacts of climate change brought on by greenhouse gases and CO₂ emissions and strive to institute policy, laws, and regulations that minimize impacts while providing incentive for new human behaviors that decrease impacts. A large development that will dramatically increase the impacts of humans on this agricultural space will exacerbate existing impacts of climate change that cannot be easily reversed i.e., drought and mandatory water rationing, record heat and wind that increases wildfires. Approval of this project by a federal agency is counterintuitive and counterproductive to the Biden administration's goals for reducing impacts of climate change.
- Housing/Homelessness: the need to employ people at a 24/7 casino operation may be touted as a great job creator but housing needed for casino workers only exacerbates current demands for housing, which is already stressed. A recent report stating homelessness has increased 5% in Sonoma County highlights the current unmet need for housing. Housing stock is inadequate and the cost is likely out of reach for the average pay of a casino worker. If casino workers choose to commute from surrounding areas because of a lack of local housing, the impacts of traffic, noise, inadequate infrastructure, and climate change already noted will worsen.

For all the reasons stated above, we join our neighbors, local residents, and local native tribes in opposing the (non-Sonoma County native) Koi Nation's proposal to have land taken into Trust in order to build a resort-style casino. Thank you for the opportunity to comment.

Regards,

Elizabeth Acosta & Stephen Rios, Residents
Windsor, Sonoma County (CA)

From: Regan Arndt
Sent: Wednesday, June 15, 2022 10:58 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Regan Arndt <reganandrosanna@gmail.com>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Home sales & home values are affected! Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Additionally the Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - Study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton,

Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Most Importantly the Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Also - This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. My husband & I are Cyclists & have Recently moved here primarily because of it's Landscape & Serenity & Easy Cycling Lifestyle. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

The reasons I addressed are Extremely Serious & Important for our Livelihoods & Financial Stability. Yet they are Only a Very Small Amount in comparison to the list of the Myriad Reasons the Casino is Not a positive option for this location.

Please take Serious Consideration on the Negative affect of this proposal. There are many other options which can & Should be considered with a 'Win-Win' on All sides and Not One-Sided.

Thank you very much for considering my comments.

Rosanna Arndt

5099 Deerwood Drive

Santa Rosa, Ca. 95403

From: Debra
Sent: Wednesday, June 15, 2022 9:07 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed casino by Koi Nation Shiloh Resort Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Dear Ms Dutschke,

I am writing to express my overwhelming concerns regarding the proposed Koi Nation Shiloh Resort and Casino Project. There are so many reasons that this is an inappropriate site for such a massive altering of the area.

I am a resident of the immediate area of this proposed project. I am also a descendant of the Oneida band of the Iroquois Nation in the upstate New York region. I am appalled at what happened in the past with Native Americans being forced off their land and deprived of their rightful home. Its shameful and I do believe we should do what we can do assist our brothers and sisters with finding a homeland so they can thrive. That being said, it seems as if this proposed site is extremely inappropriate for this casino project.

I live directly across the rural road from this proposed project. It is currently planted as a vineyard. In the past five years we have had two devastating wild fires that tore through the exact area. The vineyards helped to stop the fires. However, the evacuation of the area was a nightmare, my head can't even fathom how we would safely evacuate with a greatly increased number of vehicles and persons attempting to flee if another fire swept through. Do the math, its not feasible to expect to avoid disaster.

Secondly, we are in the third year of a serious drought, well documented. I, and most of my neighbors, have lived here for over 30 years. We have wells we rely on for our water needs. I am extremely worried that, if the casino went in and they decided to tap ground water, we would quickly run into a situation of failing wells. I already use grey water to keep my garden and trees alive. If they attempted to hook up to municipal water it would be unfair to us who have repeatedly been denied water hook ups by the water agency.

Third, the Shiloh site is extremely ill advised as it is in a residential neighborhood. My grandchildren attend the elementary school at Mark West. Why would anyone put a casino near a little kids school? The Shiloh Regional Park is directly adjacent to the east of the proposed site. Esposti Park is a well used soccer, baseball and recreational facility, again right directly across from the proposed casino site.

There are many other valid concerns regarding the decision to pursue this area for another casino. There are too many already in this area. If The Koi Nation is set on a casino and resort it is suggested that they find a site which is industrial or commercial and not rural residential.

Lastly, I am requesting that the period of public comment be extended so our neighbors and officials can weigh in on the effects of plopping down a large casino in this ill advised location.

Thank your for your consideration,

Debra Avanche
127 E Shiloh Rd
Santa Rosa, CA 95403

From: Dina
Sent: Wednesday, June 15, 2022 10:33 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

I am writing to protest the proposed Koi Nation Shiloh Resort and Casino Project. This project must not go forward! To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

I mention only a few of the many concerns I have as a North Santa Rosa resident for this project going forward. It needs to be stopped. Period.

Sincerely,
Diane Baines

2417 Appletree Dr.
Santa Rosa, Calif. 95403

From: Robert Brink
Sent: Wednesday, June 15, 2022 3:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

>> I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

>>

>>

This is to affirm that my wife and I, as well as every other person living in this area to whom we have spoken, are vehemently opposed to a casino at the proposed site. Not only is a third casino in Sonoma County a bad idea in its own right, locating it at the junction of Old Redwood Hwy and Shiloh is a terrible idea on many grounds.

The existence of nearby schools, churches and stable residential communities makes the location a supremely poor choice for obvious reasons. Even if the casino weren't popular enough to be financially profitable, the traffic it would create would adversely impact day and night travel and impose an intolerable burden in the event of another mandatory evacuation. That the area is not zoned for such an enterprise cannot be ignored, nor can the obvious impact it would have on already limited water supplies. Having a 24 hour a day enterprise right next to a residential area with churches and schools is purely insane for reasons of noise, light pollution at night, the risk of drug peddling and prostitution, and limited infrastructure.

That the Koi Nation has no significant connection to this land makes the proposal ludicrous and offensive to any coherent human being with normal sensibilities.

Allowing this travesty to happen will permanently disgrace any public official who supports it.

Do not allow this insane proposal to gain momentum.

Thank you,
Robert Brink, MD
6155 Acorn Hill Ln, Santa Rosa, CA 95403

From: Louise Calderon
Sent: Wednesday, June 15, 2022 6:33 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation Shiloh Resort and Casino Project

I am opposed to the proposed casino at its present anticipated location. It would be adjacent to a public park and a community of houses on the outskirts of Windsor. The traffic to be generated by the casino cannot be supported by the roads surrounding it. As evidenced by the Tubbs and Kincaid fires it was a nightmare trying to exist Windsor. We have enough casinos, but not enough open space that generates and encourages natural habitat, and an enjoyable family community. We are asked to ration water and the proposed casino would be in contradiction to our water rationing dictates. Please, no casino/resort on this location.

Louise Calderon, 338 Winemaker Way, Windsor

From: Mike Carlson

Sent: Wednesday, June 15, 2022 5:11 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Greetings,

I am writing to you today in opposition of the proposed Casino on Shiloh road. As a nearby resident, I cannot understand how anyone would suggest a mega-casino/hotel in a residential neighborhood with an elementary school, regional parks and churches all within eyesight. I am not against casinos and very much support tribes having access to this important revenue stream, it just does not make sense at this proposed site.

My major areas of concern beyond suitability given the residential/agricultural setting is wildfire risk. In the last five years, we have been evacuated twice and the last fire burned part of my property...with a single point of entrance and egress to my home abutting a mega-casino and hotel, the evacuation difficulties are a serious hazard that will not be able to be mitigated.

Water is also a concern...where will the water come from to serve this new business when everyone is already under severe rationing?

I believe the County should help the tribe find a more suitable location. The Gratin casino was built in a commercial/industrial area which makes sense. Even the site immediately off 101 on Shiloh Road which has had a development sign for the last five years would be a much better site than what is being proposed.

I hope the EIR process will find that this site scores very low as compared to alternatives and the project should not be allowed to continue.

Thank you,
Mike Carlson
6285 Shiloh Ridge

From: Martha Clark

Sent: Wednesday, June 15, 2022 4:45 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Fwd: Koi Nation Shiloh Resort and Casino Project

> Please add my name to those opposed to the proposed casino by the Koi Nation. Sonoma County does not need a third casino. A casino has no place in residential neighborhoods or in close proximity to schools. I feel this casino will greatly devalue the property values of nearby homes, not to mention the increased usage of water, already so scarce in the county. The increase in area traffic and the loss of the scenic vineyard will be a detriment not only to the area near and around Windsor, but to the entire county. Lastly the Koi tribe has no direct connection to the land involved. Please do all you can to stop the building of this casino.

>

>

> Martha L. Clark

> 523 Juniper Lane

> Windsor, CA 95492

From:

Sent: Wednesday, June 15, 2022 4:43 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To: Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

Hello Amy—

I would ask that you take a few moments to review the attached documents—as pictures tell a thousand words.

Additionally, we are providing scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. Our first request, is that the BIA respectfully extend the public comment period which would assist in allowing the impacted public to participate more fully in the NEPA review process. To provide only 30 days for public comment on such a significant federal action is insufficient. In particular, that the comment period opens on the Friday before a federal holiday, does not allow for full and fair public review. As this Proposed Site will significantly affect the quality of the environment involved in the project, the project should undergo a full EIS analysis with sufficient time for the impacted public to meaningfully participate at each stage of the process.

Thanking you in advance for taking the time to review the attached documents and for giving your attention and assistance to this very important matter.

Judith and John Coppedge

Does a Casino Belong Here?

We moved to Sonoma County after 45 years in Hawaii. We purchased seven acres and built our home here in 2012. After several years of evaluating locations, we chose this area for its beauty, safety and feeling of community.

We are very concerned and disturbed by the proposed Koi Casino Site which is located at the bottom of our hill in a residential area. Please take a moment to scan the attached photos and map highlighting the inappropriateness of this proposed location.

We are particularly concerned about:

--Potential harm and safety to families; potential loss of life

--Fires—we have been severely impacted with fires in 2017, 2018, 2019, and 2020; we have had to evacuate multiple times—each time has been a dangerous and frightening experience due to the difficulty in egress and ingress in this area

--Lack of water—many wells in our area have gone dry; with drought expected to worsen, water is a huge concern

--Crime—facts show that theft, vandalism, drugs and prostitution significantly increase in and around casinos—they are never located in a residential area

--Environmental impact—to include the abundant wildlife; the removal of vineyards which have served as our firebreak, water and sewer

Our ask is that you contact The Bureau of Indian Affairs at the following address and share with them the inappropriateness of this proposed location—and as such, this property should not move from fee to trust.

Darryl La Counte, Director of the Bureau; Bryan Newland, Assistant Secretary
Bureau of Indian Affairs
Depart of the Interior
1849 C Street, N.W. MS-4606
Washington, D. C. 20240
Phone: (202)208-5116

We appreciate your attention in this matter and sincerely hope that you and your fellow state, local and community leaders will do everything in your power to change the location of this proposed Casino site to a non-residential location.

Thank you,

Judith and John Coppedge

Does a Casino Belong Here?



ESPOSTI PARK-E. Shiloh Rd.

- 10 acres
- baseball, soccer fields
- little league playing fields
- family picnic areas



OAK PARK NEIGHBORHOOD-E. Shiloh Rd.

- single family homes
- approx. 75 homes
- \$740-\$1.35M price range

MAYACAMA COUNTRY CLUB and SHILOH ESTATES-E. Shiloh and Faught Rds.

- private Country Club
- Jack Nicklaus golf course
- 95+ single family, multi-million dollar homes



SHILOH RANCH REGIONAL PARK-Faught Rd.

- 850 acres
- hiking trails, creeks & ponds
- horseback riding trails
- family picnic areas



FIRE DANGER—LOCATION SHILOH RD AT FAUGHT RD

DOES A CASINO BELONG HERE?



TUBBS FIRE-2017

- deaths—22; size—36,800 acres
- buildings destroyed—5,640
- size—36,800 acres
- mandatory evacuations; loss of power, water and gas

KINCADE FIRE-2018-19

- size—77,800 acres
- buildings destroyed—374; 90,000 structures threatened
- mandatory evacuations; loss of power, water and gas

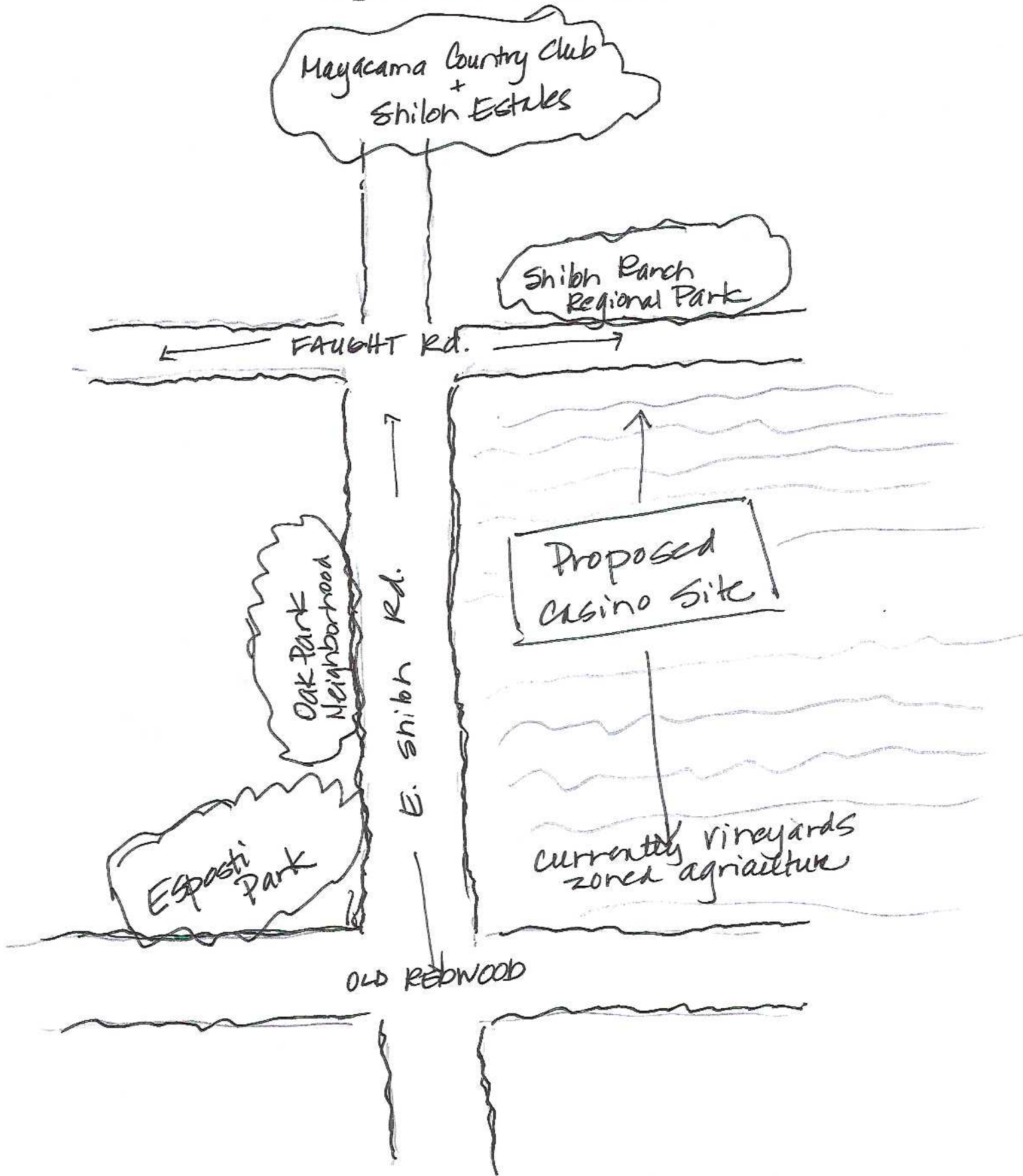
WALBRIDGE FIRE-2020

- deaths—6; -size—363,200 acres
- buildings destroyed—1,490
- mandatory evacuations; loss of power, water and gas

GLASS FIRE—2020

- size—67,500 acres
- buildings destroyed—1,555
- mandatory evacuations; loss of power, water and gas

Proposed Casino Site



From: Sidnee Cox

Sent: Wednesday, June 15, 2022 1:02 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Re: Koi Nation Shiloh Resort and Casino Project

To: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Hello BIA Director Dutsche,

Thank you for this opportunity to submit public input regarding the environmental impacts of the proposed Koi Nation Resort and Casino Project on Shiloh Road adjacent to Windsor, CA. There are many environmental impacts that need to be studied while considering the placement of this proposed casino.

First of all, I was involved in a citizen's group that helped shape Windsor as it became incorporated as a town in 1992. Shortly thereafter, a community separator and Urban Growth Boundary was established around Windsor to provide critical open space. This open space proved to be a vital firebreak during the Kincade fire in 2019 that threatened to destroy our town. The flames came within a half mile of our neighborhood on East Shiloh.

In addition, much of Shiloh Regional Park burned in the 2017 Tubbs Fire. I watched the huge red glow on Shiloh Ridge as the park was burning during this disaster! Only a change of wind stopped the fire from racing down into our valley and the neighborhoods on East Shiloh. That was the night when 4,658 homes were destroyed.

Secondly, in our fire prone area, evacuation routes must be considered. The roads surrounding this proposed location would not be capable of providing safe evacuation routes for both the existing neighborhoods as well as the patrons and workers at the proposed casino resort complex.

Please see this short video clip from ABC News: <https://abc7news.com/kincade-fire-in-windsor-ca-cal-map/5652149/>

Also please see this video showing how the fire impacted Shiloh Regional Park and the evacuations from our area:

<https://newsofthenorthbay.com/2019/10/live-cal-fire-command-center-at-shiloh-regional-park-in-windsor/>

Third, the impact of intensive development in this agricultural area, which includes 850 acres of Shiloh Regional Park, would greatly endanger the wildlife and ecosystem of this protected region. Please study the impact that vehicle pollution, groundwater

pollution (and depletion), light pollution, noise pollution and toxic emissions of all sorts would impact this park and the surrounding area.

Fourth, other local tribes in our area oppose this project.

In conclusion, there are many other issues that need to be considered in addition to the ones above mentioned. Please study them all in as you make your decisions.

Thank you for your time and efforts.

Sincerely,

Sidnee Cox
5846 Leona Court
Windsor, CA 95492

From: Deborah Curle
Sent: Wednesday, June 15, 2022 9:55 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Deborah Curle <dcurle77@att.net>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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TO: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for considering my comments and concerns as follows:

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established

communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass

into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the

day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have

on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development.

Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to

this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian

Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road – walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock - Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry.

Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods., a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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Thank you for taking my concerns into consideration,

Deborah Curle

From:

Sent: Wednesday, June 15, 2022 4:36 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Casino Project

I am strongly opposed to this project!

From: Christine Daniels
Sent: Wednesday, June 15, 2022 8:49 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Casino

Amy Dutschke
Reg. Director
Bureau of Indian Affairs
Pacific Region
Sacramento, Ca 95825

I am writing to say that I strongly oppose the proposed Koi Casino In Santa Rosa, CA. They have picked an area that they have no ties to. The enviornment will be greatly affected. Fire and water are a huge concern. Our water is at drought level. We have had fires year after year. Trying to evacuate is a nightmare.

The damage to the surrounding homes, churches, schools, parks, etc. is of huge concern.

This casino will ruin our area. Everyone is upset about it and amazed that it is even being considered in this area.

Please help us stop this threat.
Thank you for your consideration,
Christine Daniels
135 East Shiloh Road
Santa Rosa, CA 95403

From: Christy Delucchi

Sent: Wednesday, June 15, 2022 4:09 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino

> To whom it May concern,

> I have lived in Sonoma Country for 50 years, 40 have been in the beautiful family town of Windsor. My husband and I built our home on 1 1/2 acres and raised our 4 children. We have watched our area slowly develop with an eye to try and keep a balance that allows for homes, agriculture and different levels of parks that encourage family outings and community based interactions. During the last several years an added challenge was the overshadowing issue of global warming, drought and increased fire concerns. We have already noted that in the area of the proposed casino (which this area as far as I have researched has no significant connection by the Koi tribe) is in an area that embraces agriculture as well as neighborhood zoning. Our roads in that area which are in need of repair have had several large apartment complexes added recently, making an already congested road (Old Redwood Hwy) a nightmare to navigate on a normal day and incomprehensible during fires or other emergencies which have been happening with a greater frequency.

> What of drought concerns and large hotels and building that will attract vast numbers of people using a declining resource.

> It's amazing that in an area of developed agriculture and family neighborhoods an organization with NO TIES to this area can build what ever they would like that does NOT benefit or is wanted by the existing community. We already have two casinos in the area that are adequate .

> Please do not allow something that is so wrong for so many reasons and will change this beautiful area for ever.

> Respectfully yours,

> Christy Delucchi

From: Eddie Flayer
Sent: Wednesday, June 15, 2022 6:18 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad -
Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Location of Other Northern California Casinos - Please study the location of the other 47

casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Thank you for considering my comments.

Eddie Flayer

899 Boyd Street Unit B

Santa Rosa, CA 95407

From: Lorenzo Freschet
Sent: Wednesday, June 15, 2022 10:36 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

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Comments

Thank you for considering my comments.

*Lorenzo Freschet
3126 Montecito Meadow Drive
Santa Rosa, CA 95404*

My List of Statements/Issues

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these

schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30

mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

From: Rick Fuchs
Sent: Wednesday, June 15, 2022 9:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I hope this email finds you well.

I am writing because I live close to the proposed Koi Nation Casino and I am vehemently opposed to this casino for many reasons.

I wholeheartedly support our Indian tribes and am proud to say that I worked for a law firm in Portland, Oregon (Law Offices of Craig J. Dorsey) who represented The Confederated Tribes of Siletz Indians of Oregon and the Chinook Casino Resort. In fact, my former law firm won a landmark case against the United States of America.

See- Confederated Tribes of Siletz Indians v. United States, 841 F. Supp. 1479 (D. Or. 1994)

<https://law.justia.com/cases/federal/district-courts/FSupp/841/1479/1508931/>

The Koi Nation casino should not be approved. My neighbors could face another fire disaster and potentially more lives could be lost.

During the Tubbs fire, my house and my entire neighborhood burned to the ground. Our rural small streets and countryside infrastructure is not able to accommodate additional cars evacuating on these small surface streets. It took my neighbors over 1 hour to evacuate less than 2 miles to the 101 freeway from my house in Mark West Estates.

The proposed Casino build is in a historically bad fire danger area that consists of vineyards, open space, county parks, single family houses and the increased traffic it will draw could create delays and traffic jams if evacuation becomes necessary.

One just needs to drive through the area to see that it is not a good location for this Casino.

The Koi Nation tribe, as you may already know are from Lake County, 78 miles away. The Koi became a recognized tribe in 1916, the year the federal government bought 140 acres know as Purvis Flats near the town of Clearlake known as Lower Lake Rancheria.

The proposed Koi Nation gambling will no doubt drive housing prices down because few people want to live near gambling center because of the type of people that it attracts.

The crime rate will undoubtedly increase because of all of the things that go along with gambling. crimes that could include but not limited to drug dealing and drug use, robbery, prostitution, burglary, drunk driving and theft.

We already have 2 casinos within 30 minutes of this location. River Rock Casino and Grayton Casino.

We have many alternate locations in Sonoma County that would be a better fit for yet another casino.

More appropriate location could be near the light rail line (S.M.A.R.T) or even closer to the Santa Rosa airport.

Please reconsider the impact this may have on our small town infrastructure.

Thank you for rejecting this proposal with prejudice.

Kindly,

Fredric Fuchs
4685 Katie Lee Way
Santa Rosa, CA 95403

From: Pamela Geiss
Sent: Wednesday, June 15, 2022 4:01 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Chad,

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 30+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, the Town of Windsor will be most seriously impacted - again NOT in a positive manner. More cars, more crime, increased public safety expenses without the benefit of increased revenues (the casino is actually in Santa Rosa vs. Windsor). When we all evacuated three years ago, the roads were clogged and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose the building of this casino and hotel.

Thank you,
Pamela Geiss

From: Patty Grimm
Sent: Wednesday, June 15, 2022 2:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort & Casino Project

I am writing to provide scoping comments on the above mentioned project. I request that the public comment period be extended & that additional steps are taken to allow the public more fully. Providing only 30 days seems unreasonable for a project with so much impact on our community.

My concerns over ripping out the beautiful vineyards of the area to put in a casino... that is not needed, are many. We already have 3 within a 30 mile radius! We do not need more! It would bring traffic, crime, & noise to a bucolic part of our county. And if that is not enough, the location is in the heart of our wildfire country!!! The traffic that would occur when an evacuation is required would endanger the residents of our community!! Evacuation routes are already overloaded and the risk of not being able to get out in time is real! And let's also add our current drought! We simply cannot add extra consumption at this point in our history.

These are only a few of the issues involved with allowing a casino on this property. Thank you for realizing what an important issue this is to the residents of Sonoma County.

Patty Grimm

From: Dwight Haldan

Sent: Wednesday, June 15, 2022 5:27 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>

Subject: [EXTERNAL] KOI - Shilo Casino project

Dear Folks:

I was not clear as to which whom I should direct this email, so am sending to both of you. This is coming from a family that has a home in the general area.

My family and I are fully opposed to this project and on several grounds.

1) I am not certain that an out-of-area tribe should have the right to [presumably] purchase land wherever it wants to and expect that it can create additional tribal lands for a commercial project. I understand that this is a Lake County (Lower lake) tribe that has no real connection with Sonoma and definitively not with this area.

2) Assuming that hurdle is somehow ever met, this is the wrong place for such an endeavor. At Shilo Road and 101 there are many commercial areas that already exist. This however would be within a residential neighborhood with school, parks, peaceful settings—all of which would be terribly and irrevocably upended if this project are to be allowed. Casinos are, for better or worse, historically known to attract people with a variety of ailments (drug/alcohol/gambling addictions) which further lead to a general increase in crime which would lead to a degradation of the surrounding residential and agricultural communities and value of properties. It would all endanger the residents of the neighborhoods.

3) Aren't there sufficient casinos in the area already?

4)The extensive environmental harm and changes would need ample studies, to include all forms of pollution—traffic, noise, light, chemical, etc. And the need for increased services and support (utilities, sewer, water) come at a very bad time for California.

5) Giving the public only 30 days is too little notice—especially starting just before a long weekend; it is downright unfair.

6) Trying to 'buy' into this by pulling the project up by enticements [such as claiming union labor would be used and it would create many jobs] is not genuine. I am certain that there will be an increase in jobs—as the need for increased police, fire and medical personnel will be increased, as well as increased expenses for all except the financial backers of this poorly-thought out idea.

Please reject this project in its entirety.

Respectfully submitted,

Dwight Haldan, J.D.

From: josh hammer

Sent: Wednesday, June 15, 2022 4:58 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Chad,

I would like to strongly oppose the proposed casino off of Shiloh Rd. (***Koi Nation Shiloh Resort and Casino Project***). There are already several casinos in Sonoma County and no more are needed. This will negatively impact the peace of our local neighborhood due to increased noise, traffic, water usage, and public safety. Also, we don't need another casino that is taking people's hard-earned money and losing it when they don't have the restraint. This will be one more location that is taking advantage of those with gambling addictions. An extra casino is definitely not what Sonoma County needs.

Please vote no on this newly proposed casino.

Thanks,

Josh Hammer

Resident of Wikiup Neighborhood, Santa Rosa, California

From: Kristine Hannigan

Sent: Wednesday, June 15, 2022 8:37 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] "Koi Nation Shiloh Resort and Casino Project"

Hi Chad,

I live near the proposed Shiloh Casino on Lockwood. The vineyards beyond my house back up to Shiloh. I have two young children. I STRONGLY oppose this project. In fact, for our family's safety, peace and health we would probably move if this is to happen. There are so many reasons I don't want this to happen. But mainly because this is in a neighborhood. I don't think casinos should be near homes in a non business district.

The main ones for my family are fire safety- We have been evacuated and stuck on the 101 several times trying to get out before the fires. The size and significance of this Casino would create a hazard and fear that we would get stuck and not be able to evacuate on time. Quality of neighborhood, Noise (I moved here to be in an open space). In addition to all these reasons: Proximity to Residential Neighborhood, Churches, School, Infrastructure Roads Loss of Open Space/Greenbelt, Negative Ecological Impact, Noise, Drought/Water Availability/Mandatory Water Rationing, Impact of Ignoring Zoning Restrictions, Public Safety, Quality of Neighborhood Activities (kids can't play outside with this), Emergency Response Time, Greenhouse Gases and lastly Decline in my property value because no one wants their house a stone's throw from a casino.

I am opposed to any casinos in neighborhoods and I think it is the wrong place to have a casino. If the Koi wants to build a casino off the freeway in a business district it makes more sense and I would support that. But what is also important Koi have NO significant Connection to the land by the Koi Tribe. I understand they relocated to Santa Rosa but that is not a significant connection historically to Sonoma County. I understand historically they are from Clearlake.

I support them building a casino from where they are from in Clearlake and even if it has to be somewhere else - but NO CASINOS in NEIGHBORHOODS please.

Thank you,
Kristine

From: Kristine Hannigan
Sent: Wednesday, June 15, 2022 8:49 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke Regional Director Bureau of Indian Affairs, Pacific Region 2800 Cottage Way,
Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process. Comments Thank you for considering my comment

Kristine Hannigan
6166 Lockwood Dr.
Windsor, CA 95492

From: Kristine Hannigan
Sent: Wednesday, June 15, 2022 8:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Hi Chad,

A few more reasons I oppose this project. Thank you.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business. Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant. Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day. Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino. Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in

rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Best,
Kristine
6166 Lockwood Dr.
Windsor, CA 95492

From: Gregory Heath
Sent: Wednesday, June 15, 2022 9:32 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

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Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public

safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are

part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in

the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages- There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and

neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality,

aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Thank you for considering my comments,

Gregory F. and Janine E. Heath
730 Shiloh Terrace
Santa Rosa, CA
95403

From: MARY HESS

Sent: Wednesday, June 15, 2022 6:32 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Casino and Resort Proposed Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

June 15, 2022

To: Bureau of Indian Affairs, Pacific Region

Re: Comments on the proposed Koi Nation Shiloh Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

This semi-rural area between Santa Rosa and Windsor needs to remain just that. Green space is being gobbled up at an alarming rate by those who wish to make lots of money. This project is insane and unfair to the surrounding communities. The TRAFFIC will become gridlock during commute hours on Hwy 101 and Old Redwood Highway contributing to AIR POLLUTION. If there were another FIRE and ensuing evacuations, people will die. Our WATER table is becoming depleted and cannot sustain more development. The KOI nation is not from this area, nor their handlers, who are an Oklahoma-based mega-casino industry.

There are schools and churches within a few miles of the proposed site. The cumulative impact on the neighborhoods in the vicinity will drive housing prices down, affect family lives, and turn this quiet countryside into an urban setting. Please consider another site less controversial and more appropriate for all.

Thank you for considering my comments.

Mary T Hess
255 Ursuline Rd Santa Rosa, CA

From: Michael Higgins
Sent: Wednesday, June 15, 2022 3:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To whom it may concern,

I strongly oppose this development.

- This will lead to a dramatic increase in vehicular traffic in an already stressed infrastructure while negatively affecting the environment with vehicle pollution and noise.
- Not only will people visit the casino, this project will require a large staff that will largely come from outside the community, further overtaxing the infrastructure.
- There are residential areas next to and nearby this area. This will cause a negative effect on property values and the quality of the neighborhoods.
- The increase in traffic and number of people in and around this site will invite an increase in crime greatly affecting public safety.
- We are in an era of increasing drought. This site will exacerbate the problem by drawing more resources and depleting the ground water further.
- This will impact wildfire response in that many more people not prepared for it will have to be evacuated and clog evacuation routes.
- The increase in noise pollution will be detrimental to the residents of the area.
- There will be added pressure on our already depleted First Responders impacting response times for all in the area.
- The Koi Nation has no legacy connection to this site.
- Sonoma County already has enough casinos, more are not needed.

This is bad for Windsor, bad for Santa Rosa and bad for Sonoma County.

Sincerely,

Michael Higgins

From: Amy Hoover
Sent: Wednesday, June 15, 2022 7:59 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

We are writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

The concerns are multi- fold: this region has more than enough casinos, there is an impact on safety for the neighborhoods, pollution during building and after thousands of cars increase in the area coming and going from the casino.

In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Thank you for considering our comments.

Amy and Chris Hoover
225 La Quinta Drive
Windsor, CA 95492

From: Eva Ingram

Sent: Wednesday, June 15, 2022 5:57 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I would like to respectfully request that this project not be approved. We already have 2 casinos which, fortunately, were not built in neighborhoods. We don't need a third. The disruption to the surrounding neighborhoods will include substantially increased traffic and associated accidents, elimination of a very popular bike route, negatively impacted real estate values, additional pressure on the limited water and power resources, and increased local crime.

Thank you for your consideration.

Eva Ingram

From: Jonathan Marvin
Sent: Wednesday, June 15, 2022 12:42 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

There are many other vitally important considerations that weigh against allowing additional casinos in Sonoma County. Such as the effects of another major impediment to fire protection, particularly in light of the fire hazards identified and dealt with in the last five years, the close proximity to churches, schools and other venues where children are prevalent (e.g., Esposti Park), and just the general negative influences that come with a casino. Thank you for considering my comments.

Jonathan Marvin
237 La Quinta Drive
Windsor, CA 95492

From: Steve Karp
Sent: Wednesday, June 15, 2022 1:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

June 15, 2022
Mr. Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
chad.broussard@bia.gov

Mr. Steven Karp
5203 Vista Grande Drive
Larkfield, California 95403

Re: Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing to urge you to not allow the casino proposed by the Koi Nation to be built on the corner of Old Redwood Highway and Shilo Road. I live very near the proposed site and do not want to see our neighborhoods turned upside down by this project.

The reasons for my objection are many and seem obvious to anyone that analyzes this objectively. They include:

- The site is bordered by residential homes in all directions who will be directly impacted by the increased traffic, noise, loss of safety for their families and reduction in home values.
- There is a family park and ball field right across the street; Esposti park.
- Increased Traffic on surface streets. Although Shilo is an exit off US 101 the casino is also off Redwood Highway and 1 block from Faught road. Both of these other roads are 2 lane country type roads which will be used as cut-through shortcuts. Faught Road goes right past the San Miguel Elementary School and will create nightmare scenario's for the school children with increased traffic rushing to the casino. Note that the solution is not to widen these roads. These were never meant to be anything but country roads and not freeway alternatives.
- Increased crime is expected around any casino that attracts cash customers and unsavory people looking to get that cash. Police will often look for crime suspects that have recently robbed money at these casinos as they fulfill their gambling fix.
- There are already two major casinos within 18 miles. Graton off 101 to the south 14 miles and River Rock off 101 to the north 18 miles. Sonoma County should not aim to become the "casino highway" of California. Graton has submitted plans to double the size of its casino/hotel/parking lot.

- The site location is not part of the Koi Nations historic land and therefore they should be given no extra consideration or allowance under any tribal treaty for locating a casino there.

Please, please do not let this project be built. If the Koi Nation wants to invest in something on this land then it should be something that is in keeping with the character of the neighborhood and Sonoma County. This could include developing housing with a community green area, establishing a winery since the land currently has commercial healthy grape vines on it, a boutique hotel that doesn't drive traffic levels through the roof, etc. Maximizing the Koi Nation profit with a casino should not be the driving factor here.

If Koi Nation is determined to build a casino, then I suggest that a more appropriate industrial location be found. There are similar size parcels located with the Santa Rosa Airport industrial park.

Thank you for your consideration and please do not let "donation politics" outweigh good common sense in turning this project down.

Sincerely,

Steven Karp

Cc: County Administrator's Office
tribalaffairs@sonoma-county.org

From: Mary-Frances Makichen
Sent: Wednesday, June 15, 2022 9:37 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Chad,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

You will see that I have thrown in every concern that could be brought up about this casino. This is because I can't tell you how desperately I feel this should not happen and how much I feel the people of Windsor are not really being considered in this process and the impact it will have long-term.

Thank you for your attention to these comments.

Mary-Frances Makichen
241 La Quinta Dr
Windsor, CA 95492

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with

air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh

Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts

of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought - 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk - The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss - This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes - Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These

fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential

flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project

would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages- There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

From: Morgan M
Sent: Wednesday, June 15, 2022 6:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

After experiencing the drastic change in the Rohnert Park, CA, where I lived prior to the construction of the FIGR casino, I'm greatly concerned at the inevitable Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location.

Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Thank you for for your consideration.

Dr. Morgan Marchbanks, EdD
Santa Rosa, CA 95403

From: Janet S Marsten
Sent: Wednesday, June 15, 2022 4:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

RE: Koi Casino Proposal

Dear Representatives,

Our quiet Sonoma County residential neighborhood is threatened by a proposed casino resort by the Koi Nation from Lake County. This must be stopped.

We have had many mandatory evacuations in the last few years due to wildfires. There is a genuine lack of evacuation routes in our area. The density a 24/7 casino would create would add to an already tenuous situation. Also, as everyone who lives here knows, drought is also a very real part of our lives and wells are running dry. The Russian River could not support a huge development such as this.

This is a peaceful community with a wildlife green space, a regional hiking park, and a little league park directly across from the proposed site. Our country roads are also popular with many group, tourist, and team bicyclists. I hate to imagine the threat to public safety and congestion this project would create.

Casinos unfortunately bring with them crime and noise. It is unfathomable that this could happen to our neighborhood.

Thank you for your time,
Janet Marsten, Sonoma County resident

From: BELVA MITCHELL

Sent: Wednesday, June 15, 2022 7:08 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Re: Communication for Bureau of Indian Affairs - ACTION NEEDED NOW!!!!

On Jun 15, 2022, at 4:46 PM, BELVA MITCHELL <mmitchellbc@aol.com> wrote:

We are in strong opposition to this project for all of the reasons listed in this message. Also as residents in close proximity to the Esposti Park ,in the last 5 years there has been a significant increase in noise from many sources . Loud dogs, motorcycles, vehicles with loud exhausts,large trucks with engine brakes, construction along Old Redwood Highway and emergency vehicle sirens are very prominent.

The traffic volume /vehicle noise at this location and vehicle speeds are currently a concern. In the early evening and early night time it is like being at a race track. I have expressed this concern to the Windsor Police approximately 6 months ago. There does not seem to have been any enforcement to curtail the situation. At times there are vehicles including RV's in front of Esposti Park on the Old Redwood Highway over night with occupants inside. I am concerned that all of the items will only worsen if the Casino is approved.

Thank you for considering our concerns.

Clarence & Belva Mitchell

Sent from my iPad

Begin forwarded message:

From: Casino Opposition - OurCommunityMatters

<ourcommunitymatters2@gmail.com>

Date: June 15, 2022 at 5:45:22 AM PDT

Subject: Communication for Bureau of Indian Affairs - ACTION NEEDED NOW!!!!

SECOND REQUEST!

IMMEDIATE ACTION NEEDED!!!!

This is the second and **MOST IMPORTANT REQUEST!**

It is urgent that you respond to these requests IMMEDIATELY.

On May 27, 2022, The Press Democrat published a Notice of Preparation of Environmental Assessment/Tribal Environmental Impact Report.

What this means to our fight against the proposed casino location is that notice **starts a 30-day Scoping Comment period between May 27th and June 27th.**

This is the ONLY TIME we will be able to let the **BUREAU OF INDIAN AFFAIRS (BIA)** know our specific environmental concerns related to the proposed casino site.

DEADLINE 6/27

WHAT: Send an **email** (preferred method) or **mail** to the BIA using the templates we are supplying and selecting all or some of the Statement of Issues that you feel strongly about.

When: **NOW!** As soon as you receive this message.

MORE: **Please share this request with everyone you possibly can. We want thousands of emails sent.**

1st Template: is for US Mail

2nd Template: is for Email

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Date

To: Bureau of Indian Affairs, Pacific Region

Re: Comments on the proposed Koi Nation Shiloh
Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

INSERT STATEMENTS/COMMENTS HERE

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

TO: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project

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Bureau of Indian Affairs, Pacific Region
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Comments

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

List of Statements/Issues

Choose the ones that mean most to you and include in your email to the BIA.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

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these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live

normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential

neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true

impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if

any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages- There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local

environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in

commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please

study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing

From: Julie Neff

Sent: Wednesday, June 15, 2022 4:56 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Sir:

I would like to voice my opinion about the Koi Tribe Casino that is currently being discussed for the parcel of land just off Old Redwood Highway and adjacent to the town of Windsor.

I understand that the Indian tribes have a right to build on their native lands, but this is not their native land. This tribe has no significant connection to the land where they are proposing to build this casino.

We moved to Windsor 11 years ago because it was a family friendly community and surrounded by green spaces. This proposed casino is just too close to our Windsor neighborhoods to be comfortable for either.

In addition, can we really afford to provide water for a development of this size either from wells or from the river?

I most definitely oppose this development.

Julaine Neff
8578 Starr Rd
Windsor, CA 95492

From: Jo Nelson
Sent: Wednesday, June 15, 2022 8:17 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shilo Project

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

List of Statements/Issues

Choose the ones that mean most to you and include in your email to the BIA.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and

corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol

related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road

from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the

Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate

brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local

environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events.

How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are

highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements,

alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on

the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant t zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard

producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and

defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

MJ Nelson

From: Jill Plamann
Sent: Wednesday, June 15, 2022 10:40 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for considering my comments.

Jill Plamann

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the

project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location -

study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with

single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part

of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction- Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago

and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway,

groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the

timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant

because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary

and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study

what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic

gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino

resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant t zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and

defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural

area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park

From: Steve Plamann

Sent: Wednesday, June 15, 2022 2:27 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino Project

To Whom it May Concern,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Bad from All Angles - To put a gambling casino next to long established neighborhoods and within a mile of an elementary school, while destroying a vineyard at the same time, makes this an unfit project for our community.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Crime – Our neighbor is a Rohnert Park police officer and he told us many times how much crime has risen in Rohnert Park since the casino opened there. Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation

and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

I sincerely hope the residents of this area are listened to.

Steven Plamann
112 Anna Drive
Windsor, CA 95492

From: Elizabeth Pulcheon

Sent: Wednesday, June 15, 2022 4:11 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Re: Comments on the proposed Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

My comments and concerns:

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric tons of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do

once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone.

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected

by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are

located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Thank you for considering my comments.

Elizabeth Pulcheon
8797 Marianna Drive, Forestville, CA 95426

From: J. Robinson
Sent: Wednesday, June 15, 2022 10:12 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino

Mr. Chad Broussard
2800 Cottage Way, Room W-2820,
Sacramento, California 95825

Dear Mr. Broussard,

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. I ask that the BIA extend the public comment period and take additional steps allowing the public to participate more fully in the NEPA review process. Providing just 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not allow for full public review. This proposal will significantly affect the quality of our environment and should undergo a full EIS analysis with enough time for the public to participate *at each stage of the process*.

Though not the original creator of the paragraphs below, I find all of the points made to be significant and particularly would urge you to strongly consider the significantly inappropriate placement of the casino and the extreme and irrevocable environmental damage it will cause to our wildlife and wild lands.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated

with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. [https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/ Documents/Dam-Failure-Inundation.pdf](https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf)

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or

a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire. Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino site are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages- There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with

the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services,

Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space - Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will

be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors’ car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents’ health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents’ health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will

worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Thank you for considering my comments.

*Jane Robinson
1704 Vallejo Street
Santa Rosa, CA 95404*

From: Tim Ryan
Sent: Wednesday, June 15, 2022 1:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to express my support, with some reservations, for the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA *not* extend the public comment period. Thirty days is more than enough for any substantial concerns or objections to be raised. Since a resort and casino hardly qualifies as major infrastructure, it's my opinion that a full EIS analysis is not necessary.

Since I am a local cyclist and use the surrounding roads frequently, I would very much like to see improvements made to the shoulders on Shiloh Road as part of the construction project. More important is the impact this facility will make on the already car-dependent character of the surrounding area. Please consider making approval of the project contingent upon the (long planned) extension of the SMART train line to Windsor along with a new station at Shiloh Road. Plans must include the construction of adequate housing to accommodate any new workers that may move to the area.

Thank you for considering my comments.

Tim Ryan
220 Shortt Road
Santa Rosa, CA 95405

From: Marie Salerno
Sent: Wednesday, June 15, 2022 2:31 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

This has a lot of ramifications for many people in the area.

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for your attention to this matter
Marie Salerno
1587 S. Novato Blvd., #304
Novato CA 94947-4133

Guns and women's right to choose. In the 60's we withheld our taxes to oppose the Viet Nam War. Maybe we need to do that again and tell the politicians what we're doing.

From: Mary Stuart

Sent: Wednesday, June 15, 2022 9:42 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>

Subject: [EXTERNAL] KOI Nation Shiloh Resort and Casino Project

Dear Mr. Broussard: I have strong objections to the KOI proposed project for a casino to be located at the Shiloh Rd. adjacent to the town of Windsor. This is an area that does not need any large scale casino and/or resort. We already have two casinos within a 20 minute drive of this location. How can another possibly be sustainable? My concern includes traffic, which Shiloh Rd. can not accommodate, the agricultural nature of the surrounding area, access to our local regional park nearby on Westside Rd., as well the town of Windsor which sits right across from the designated site, and is already a busy residential and shopping destination for locals and tourists. There are playgrounds and neighborhoods directly in this vicinity that will be negatively impacted by such a project.

It would also be completely irresponsible to allow this project to move forward while we are experiencing the worst drought in decades, perhaps centuries. People in the nearby town of Healdsburg are already unable to satisfy their water needs. I am a long time resident of Sonoma County living in the west on the outskirts of Santa Rosa since 1985 and am frankly shocked at this proposal. The affect would be devastating, we stand to lose the character and scenic beauty of our county should this plan be allowed.

Further, it's my understanding that the KOI are not even a Sonoma County tribe. It's my opinion that they should not be permitted to encroach on our local tribal casinos.

Please reject this proposal. I request that my name and email address be added to all future mailings or announcements for this project.

Thank you for your attention to this matter.

Mary B. Stuart
4709 Guerneville Rd.
Santa Rosa, CA. 95401

From: Tom Thornsley

Sent: Wednesday, June 15, 2022 7:01 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation of Northern California Shiloh Resort and Casino Project

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I would like to know if the NOP published stated the extent of the project description. All I can find is the intent to build a casino and the size of the property. It seems to me that an NOP without the extent of the project is insufficient for informing the public with the information they need to make comments. This link is all I could find. https://www.shilohresortenvironmental.com/wp-content/uploads/2022/05/NOP_EA.TEIR_Koi-Nation-Shiloh-Resort-and-Casino-1.pdf

Sent from [Mail](#) for Windows

From: Joyce Ulrich
Sent: Wednesday, June 15, 2022 3:54 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I am particularly concerned about fire danger and how this would impact evacuations, as well as water usage. We are in a historic drought and this area is already experiencing wells running dry.

Thank you for considering my comments.

--

Joyce Ulrich
5571 Yerba Buena Road
Santa Rosa Ca 95409

From: Gary Velasquez
Sent: Wednesday, June 15, 2022 3:56 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Good day, Mr. Broussard,

I would like to express our no support for approving a proposed casino located off Shiloh Road, Windsor.

Listed below are some of the adverse outcomes that would result from approving this casino:

- TRAFFIC - OLD REDWOOD HIGHWAY, FULTON RD. AIRPORT RD, FAUGHT ROAD, PLEASANT AVE, SHILOH ROAD, RIVER ROAD AND MARK WEST SPRINGS ROAD, CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7
- NOISE 24/7
- WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION
- HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT
- ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;
- BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS
- PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7
- HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF
- GROUND WATER AND WELLS
- LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE
- LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

Thank you

Gary Velasquez

Cogitativo

1608 4th Street Suite 400

Berkeley, CA 94710

From: Charlie Williams
Sent: Wednesday, June 15, 2022 8:12 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Date: 06/15/2022

To: Bureau of Indian Affairs, Pacific Region: Norther California

Re: Comments on the proposed Koi Nation Shiloh Resort and
Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30

mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Thank you for considering my comments.

Charles Williams
2112 Hillside Dr
Santa Rsoa, CA 95404

From: Claudia Abend

Sent: Thursday, June 16, 2022 5:45 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Comments on the proposed koi nation Shiloh resort and casino project

Amy Dutschke

Regional director

Bureau of Indian Affairs, Pacific Region

2800 cottage way , Sacramento , CA 95825

Providing only 30 days for comments on this proposed project is not long enough ! There needs to be more time for the public to participate in the NEPA review process ! A federal holiday is also part of that time period and can not be a full 30 days even . This project requires a full EIS analysis and time for public community input . The koi nation just recently announced and bought this property...without notifying or getting local community input of their plans . We , the current community have been here for most of our lifetime !

Thank you for considering my comments

Claudia Abend

5925 old redwood hwy

Santa Rosa , ca 95403 across the street from Ill proposed project

From: Kayla Anderson
Sent: Thursday, June 16, 2022 4:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many

students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the

Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt Creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to

residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Thank you for considering my comments.

Kayla Anderson

*7524 Rafanelli Lane
Windsor, Ca 95492*

From: Kevin Bedsole

Sent: Thursday, June 16, 2022 6:38 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Communication for Bureau of Indian AffairsObjections to proposed Shiloh Road Casino in Windsor CA

Dear Sir:

I am a resident nearby the Shiloh Road location in Windsor, Ca that is being considered for a new casino. My family strongly opposes this proposed casino being built in our residential area. I believe my reaction also is representative of the prevailing opposition and is nearly 100% from all those residents living within a 2-3 mile radius of this proposed casino site. There are numerous reasons for our opposition and many based on issues experienced with existing casinos in our county. Those that are most significant to our family are listed below.

Thank you for considering our opposition and for considering the idea of working with this tribe to move their casino project to another site that is more compatible with the concerns of the residents in our county.

Sincerely,

W. K. Bedsole

6250 Cottage Ridge Road, Santa Rosa, CA 95403

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public

safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

>>

>> Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

From: Walter Bruszewski
Sent: Thursday, June 16, 2022 6:02 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region

Dear Ms Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino, in response to the Notice of Preparation that was released on May 27. My wife and I have lived in the Oak Park development in Windsor since 1998. Our backyard is directly adjacent to East Shiloh Rd. We can see the vineyard and oak trees from our kitchen and bedroom windows. We walk our dog in Esposti Park daily and hike in the Shiloh Ranch Regional Park about twice a week. We evacuated for both the Tubbs and the Kincade fires. We are both retired and have hoped that we could live out our days where we are. If the proposed Koi Nation casino is developed on the parcel just behind our backyard, we will need to leave this neighborhood. Living next to 68 acres of parking lot, casinos and a 400-unit hotel is a miserable alternative which we will not entertain. We didn't come to Sonoma County for this.

We in California are facing what is essentially a permanent drought. The cause of the drought is Global Climate Change. I was trained to be an academic scientist and I continue to monitor scientific data which indicates that the Earth can tolerate no more heating. The wildfires, shortage of water, and disappearance of plant and animal species will only worsen. Everything about the casino will contribute to production of more greenhouse gasses and more drought. The casino project projects over 57,000 visitors a day. That means that the 68-acre parcel will be mostly parking lot and buildings. It is currently a vineyard with an established stream that drains the Mayacamas Mountains, a well-established riparian corridor and hundreds of old native California trees including oaks, buckeye, and laurels. This landscape consumes and stores greenhouse gasses and prevents warming. Asphalt, covered with thousands of cars adds to warming. Sonoma county, along with much of California is facing critically depleted aquifers. Aquifers are replenished when rain can be absorbed into the soil. Asphalt stops penetration and sends rainwater to the storm drains and into the sea. The water is lost. In the Koi Nation's Notice of Preparation, it is asserted that the project plan will include wells on the parcel to provide water and a tertiary wastewater treatment plant on site to supplement well output. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer.

If you visit the Graton Casino, you will get an idea of how much light and noise pollution will attend the proposed development, but the plan is for a casino twice the size of Graton. Now our neighborhood is dark at night and the soundscape is a subdued Coyote Symphony. If the project goes forward, the light pollution will be on the order of a large shopping mall. In the Koi Nation's Notice of Preparation, it is asserted that the

riparian corridor of Pruitt Creek will be primarily avoided in the development. It is also asserted that landscaping will be such that vineyards will be preserved around the perimeter of the parcel helping to somewhat conceal the project from view from neighboring parcels and roads. There are, however, some 96 Valley Oaks currently planted along the Shiloh margin of the parcel running from Old Redwood Highway to the Pruitt Creek bridge. The oaks produce a canopy of leaves stretching to the middle of Shiloh. Owing to the clear requirement of widening of Shiloh, these will be removed. Execution of the project is likely to destroy the bucolic and agricultural setting. Please study alternative sites for this business.

This neighborhood has proven twice in recent times to be a high wildfire risk. As it is, a lot of people use East Shiloh as the evacuation route. Evacuation of thousands of people with their cars at the casino will endanger everyone. Please study the impact of the added congestion on successful evacuation of the neighborhoods surrounding the parcel, including Oak Park, the mobile home park on Old Redwood Highway, and the new residential developments on the west side of Old Redwood Highway running north from the intersection with Shiloh. Please study whether the proposed project can be safely evacuated in a situation like the Tubbs and Kincade Fires.

Thank you for considering my comments.

Yours respectfully,
Walter Bruszewski, 219 Lea Street, Windsor CA 95492

From: Karen Burkett

Sent: Thursday, June 16, 2022 3:55 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Shiloh Resort and Casino Project

We are very opposed to a casino resort being built by Shiloh Park in Windsor.

The roads in Windsor are already over crowded and falling apart. When we had to evacuate for the Kincade fire, it was a very congested difficult and dangerous situation. There are already hundreds of new homes being built in :Windsor without increasing the road access and improvements. There are many other concerns as well

Wildfire Risk · Proximity to Residential Neighborhood, Churches, Schools · Infrastructure Roads
· Loss of Open Space/Greenbelt · Negative Ecological Impact · Noise · Drought/Water
Availability/Mandatory Water Rationing · Impact of Ignoring Zoning Restrictions · Public Safety ·
Quality of Neighborhood Activities · No Significant Connection to the land by the Koi Tribe ·
Emergency Response Time · Greenhouse Gases · Decline in Property Values

Please do not allow this project to go forward.

Sincerely,

Scott and Karen Burkett

From: Byron Calos
Sent: Thursday, June 16, 2022 7:00 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

In addition, I believe the following issues merit serious consideration.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

On a personal note, my family was evacuated three times over 4 years of fires in the area and we are located within 1/2 mile of the proposed site. The most serious threat came from the Kincade Fire, which came within 300 yards of our home. Thanks to the vineyards to the east, our housing development was spared.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Thank you, in advance, for your consideration of our concerns.

Cordially,

Byron Calos
6206 Lockwood Drive
Windsor, CA 95492

From: Sandy Chapman

Sent: Thursday, June 16, 2022 7:41 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] "Koi Nation Shiloh Resort and Casino Project"

I am somewhat ambivalent, but not for doing a casino in this location. We have several casinos and each time a new one comes in, the one before loses patrons and I see no upside. I'm not a gambler, I see jobs, but I don't think gambling is a very good use of resources, we have no water and homelessness increased. I can see the down side to those who are addicted to gambling, becoming homeless, turn to crime.

Then traffic, water, wastewater is also a huge concern. Maybe Oklahoma has rain year round or at least more than here. The Koi are not local, but Lake County was their ancestral land.

Sandy Chapman

P O Box 1761

Windsor, CA 95492

From: Barb Cottrell
Sent: Thursday, June 16, 2022 2:48 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino

I am writing to express my opposition to the proposed Shiloh Casino in Windsor, CA. The location is on the only street in and out of neighborhoods at risk from wildfires. The traffic the casino would add to these narrow streets could pose a hazard in an emergency situation. Also, a new casino would put an additional burden on existing infrastructure, particularly water resources. With some communities limiting new development because of the drought, the decision to move forward with such a resource intensive project seems ill-timed at best.

Thank you for allowing me the opportunity to express my views.

Barbara Cottrell

From: Gabriel Greene

Sent: Thursday, June 16, 2022 1:20 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi nation Shiloh resort and casino project

I strongly object to the koi nation Shiloh resort casino project. This area is subject to wildfire risk and extreme drought conditions and the casino is a bad fit for this area. There are already two casinos in Sonoma county and increased traffic and environmental damage from a third is a bad idea.

Sincerely,
Gabriel Greene
707 Willowood Way, Windsor, CA

From: Chris and Nancy Handel

Sent: Thursday, June 16, 2022 6:24 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

We are opposed to locating a casino resort complex on this site.

It is inconsistent with the county plan supported by the voters.

Chris and Nancy Handel

Larkfield, CA

From: Daniel Heidenreich
Sent: Thursday, June 16, 2022 10:23 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing you as a concerned citizen and resident of Sonoma County, California. We recently learned of the intention of the Koi Nation to petition your office for the land parcel at 222 Shiloh Road, Windsor, CA, to be placed into a federal trust. I ask for you to contemplate the following factors in your decision of whether to approve or deny this request.

The intention of the Indian Reorganization Act and Fee-to-Trust process was enacted with good intentions to restore the ancestral lands of tribes that had been displaced throughout the past centuries. This program was used in good faith by the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians, to establish sovereign territory in Sonoma County, based off legitimate claims of ancestral presence in the area. The Koi Nation originated in Clearlake, Lake County, California and therefore objectively fails the initial test of a historical connection to the 64-acre parcel in question on 222 Shiloh Road. To overlook this critical point is to categorically ignore the precedent set by all the Indian nations who have arduously and patiently petitioned the Department of the Interior and Bureau of Indian Affairs in good faith. The Koi have demonstrated twice before their disregard for the rules and process by unsuccessfully attempting to ram land trust and casino development projects into other Bay area communities of Oakland and Vallejo. This precedent is critical to understand that the same reason behind the dismissal of their applications then is valid now for this misguided third attempt for a development in Windsor. While it is sad to see the Koi people being so poorly counseled, and seemingly taken advantage of by predatory 'advisors', that does not absolve them of the same duty to prove historical ties to the actual piece of land in question.

Beyond the objectively and categorically clear facts of no historical ties, I also want to highlight to the BIA several additional realities locally which make this proposed development even further misguided. Washington D.C. is far removed geographically from this area so it is imperative the BIA appreciate the poor logistics and fragile situation in the proposed development area. Sonoma County continues to endure severe drought with most of the municipalities already implementing water rationing and conservation programs. The construction of what has been proposed as the largest casino in Northern California will have a profoundly negative impact by exponentially depleting the already vanishing water table from an area which is already in a severe drought and further stress the surrounding area, making it more vulnerable to wildfire. Conversely, vineyards have proven to be one of the best firebreak defenses in Sonoma County and this fact is confirmed and supported by University of California-Davis, the leading academic authority in viticulture and County firefighting experts. The vast majority of the 64-acre parcel is currently under vine and serving as a firebreak to the surrounding residential neighborhoods, so the proposed development would be a giant step backwards by removal of the vineyard fire protection and replacement with a giant flammable structure. Lands within one mile and adjacent to 222 Shiloh Road were consumed in wildfires in 2017 (Tubbs), 2019 (Kincade) and even last year, 2020 (Glass), albeit slightly further away. The Tubbs and Kincade fires prompted, in the middle of the night, emergency evacuations of residents in the surrounding community. There are clear images of gridlock traffic for hours on US 101 during these evacuations, so imagine the chaos and threat to life from thousands of casino guests and staff compounding to the evacuation and clearly threatening the ability of local residents to make their egress. A potential additional complication would arise from the proposed development of an assisted living, elderly care residential facility, just west of the proposed site, at the south-east intersection of the Shiloh road and US 101 interchange. Given these factors it is not difficult to see how impossible it would be to even reach the US 101 onramps with this additional traffic on two-lane, Old Redwood and Shiloh Roads.

There is an experience here that public safety in these moments is dependent on clear, unobstructed and low-density roads to allow residents to flee and first responders to access the affected areas. To grant the Koi a sovereign territory in the middle of this high-risk area, where no zoning laws or other standard public safety protocols are applicable, is to subordinate all reasonable safety expectations of the other residents to the financial interests of casino investors. This would be an unconscionable betrayal of public trust in government institutions when that trust is arguably already at an all-time low. The residents and taxpayers of Sonoma County deserve full transparency and input towards any decision that affects public safety in an area which has consistently become an almost annual wildfire flashpoint and evacuation zone.

We humbly request your consideration of these critical public safety factors in deliberating the Koi request for a land trust at 222 Shiloh Road. It is not an exaggeration to state that lives may be saved or lost depending on the outcome of your determination.

Sincerely,
Daniel Heidenreich
Resident, Parent and Community Member of Sonoma County

From: Kari Kincheloe

Sent: Thursday, June 16, 2022 8:09 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: tribalaffairs@sonoma-county.org <tribalaffairs@sonoma-county.org>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard:

We are writing to strongly protest the application by the Koi Nation tribe's proposed Shiloh Resort and Casino Project. The proposed site is highly inappropriate for the proposed use for the following reasons:

1. We are in a time of severe drought. Allowing construction of this project will significantly lower the water table in the surrounding area. The Town of Windsor is currently in a water rationing protocol and this project would exacerbate the already dire water situation.
2. The surrounding road infrastructure is insufficient to support the level of traffic generated by this project. Shiloh Road and Old Redwood Highway (the roads serving the project) are only one lane each direction. In times of emergency evacuations these past five years, traffic flow is stopped for hours trying to get existing residents out of the area. It would endanger lives to increase the road traffic by the magnitude proposed by this project.
3. The property proposed for this project is currently zoned for agricultural and residential use. Not commercial use. It is adjacent to residential communities. This is not an appropriate location for a project of this type.
4. The proposed project is adjacent to a park. The park is used year round for youth baseball/softball, football and soccer leagues. Again, not an appropriate location for a casino.
5. The proposed site is home to an extensive wildlife population that will be forever displaced because of this project.
6. This project will add significant noise and light pollution to a very quiet residential/agricultural area.
7. The Koi Nation tribe as well as the tribe contracted to manage the casino has no cultural/historical connection to this area.

We have lived in Windsor for 37 years. This project will negatively impact our community in numerous ways. Please listen to our concerns and deny the application for this project. We are placing our hopes in you to preserve our small town community.

Thank you for your consideration in this matter.

Kari Kincheloe, Real Estate Broker
John Kincheloe, R.C.E.
210 Moll Drive
Windsor, CA 95492
(707)484-2274

From: Larry Lapidés

Sent: Thursday, June 16, 2022 5:38 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

Hotels of the scope of the Koi Nation Shiloh Resort and Casino Project are rarely located in residential areas. A casino located in a residential area seems wrong just on the face of the proposal. In addition, this has a lot of specific potential problems, including use of scarce water resources and inability to exit the area in case of wildfires.

I would like to register my objections to the proposed Koi Nation Shiloh Resort and Casino Project. This This project should be cancelled.

Best Regards,

Larry

Larry Lapidés
6108 Lockwood Dr.
Windsor, CA 95492

From: Lance Cottrell

Sent: Thursday, June 16, 2022 4:14 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I write to express my strong opposition to the Koi casino project just outside Windsor on Shiloh Rd.

My greatest concern is with fire safety and evacuations. Having evacuated a number of times over the last few years, with fires immediately encroaching on my property at 853 Shiloh Glen, I am intimately familiar with the dangers caused by heavy traffic on small roads during such emergencies. Traffic backups are common at such times. The addition of hundreds or thousands of additional vehicles could easily lead to loss of life.

I am also very worried about the risks to children and other users of Esposti Park and Shiloh Regional Park which are both immediately adjacent to the proposed casino location. Increased traffic combined with alcohol consumption and likely loitering in the parks will endanger local youth and other users of the facilities.

Finally, I am concerned about traffic accidents, particularly car vs. pedestrian accidents caused by the additional traffic and due to the heavy alcohol consumption at casinos and the heavy use of the road by cyclists and walkers.

There are no other major casinos located or proposed to be located in residential neighborhoods like this. It is a completely inappropriate choice. There are numerous available lots in commercial areas with the facilities needed to support such a massive project and its associated impacts.

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Lance Cottrell - lance@lancecottrell.com

From: Lynda Williams
Sent: Thursday, June 16, 2022 2:18 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air

pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location -

study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with a single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will

dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric tons of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre->

[2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf](https://www.sonomacounty.ca.gov/Departments/Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf)

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer in this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction

during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to the duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard

greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded, overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat

and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project

would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino site are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages- There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study the impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased

vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with a single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of floodplain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, groundwater and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along

River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surrounding the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surrounding the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service recently has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mudflow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mudflow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into an area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and

tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loudspeaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in

2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and a busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years

2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well as little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as a vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a

68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as a vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Thank you for considering my comments.

Best Regards,

Lynda Williams

5801 Mathilde Drive

Windsor, CA 95492

From: Maisie McCarty
Sent: Thursday, June 16, 2022 3:04 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

We are writing to voice our STRONG opposition to the proposed Koi Nation Resort and Casino and urge you, the Bureau of Indian Affairs, not to allow the land for the proposed project to be taken into trust for gaming in our neighborhood.

This proposed casino would strongly impact the wildfire risk in our neighborhood and would severely jeopardize our evacuation route on narrow two lane Shiloh Road. We have already evacuated twice for wildfires which came close to us-the addition of some 25,000 cars per month into our neighborhood would serve as a barrier to any safe and timely evacuation route. In addition so much traffic would impede emergency response time for firefighters and other emergency vehicles.

Further, the amount of proposed water use by such a huge entity would impact the neighborhood-some of our neighbors near this proposed project already have a very fragile water table and wells and the Koi nation would need additional well(s).

The quality of use of Esposti Park across from the casino by baseball teams and other recreational users would be severely limited by increased traffic and lack of parking.

The associated noise and light impacts would be tremendous in this quiet bucolic setting.

The Koi nation has ignored zoning restrictions in the area in order to serve their desire to alter the entire neighborhood. Moreover, their ancestral lands are not even in Sonoma County, but are in Lake County, some 75-85 miles away....they have no ancestral rights in our neighborhood.

Five other Native American tribes who do have ancestral lands in Sonoma County have written objections to this plan and are wholly against it because the Koi Nation from out of the area is venue shopping.

Sonoma County supervisors have unanimously passed a resolution against this planned project.

This casino would be only a few yards from a large residential neighborhood whose occupants consist of many families with young children.

For all of the above reasons and many more, we could not be more opposed to this plan by the Koi Nation for our neighborhood. It is a very bad proposal.

We urge the Bureau of Indian Affairs not to allow this land to be placed in trust for gaming .

Very truly yours,
Mary M. McCarty
L.W. Harrison
6251 Lockwood Dr.
Windsor, CA 95492

Hello-

We recently wrote a scoping comment piece to you with our concerns about this proposed project. We would at this time request the BIA to extend the public comment period for a more thorough look at this project and its impact on the quality of our

neighborhood's environmental aesthetics and should undergo a full EIR analysis with enough time for the public to meaningfully participate at each stage of the process. This project would destroy and corrupt a family residential neighborhood to benefit a few people from out of the region with buildings parking lots and structures, making it a high volume business bringing artificial light, traffic, congestion crime and increase drunk and intoxicated driving accidents....the loss of aesthetic value will also result in a decline of property values. The size and dominance of a gambling resort at this location would dominate the landscape.

Thank you for considering our comments

Mary McCarty

L.W.Harrison

From: Therese Menzel
Sent: Thursday, June 16, 2022 7:29 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am against the development and building of the Koi Nation Shiloh Resort and Casino. It would have direct negative impact to the adjoining residential neighborhood and playgrounds. The project is planned for the intersection of Old Redwood Highway and Shiloh Road. Old Redwood Highway (two lane, locally-used, heavily traveled) is parallel to Hwy. 101 and Shiloh Road has an exit from Hwy. 101. This is inadequate for the amount of traffic that the proposed resort and casino would generate.

Any large scale entertainment development at this site would be problematic. This site is residential and agricultural in nature. It is in the middle of an active corridor of playgrounds, a regional park, and residential neighborhoods. It is not county land that is far from neighbors and playgrounds.

The Koi Nation Shiloh Resort and Casino would have a negative impact on the Town of Windsor's residents. I do support local tribes to seek casino licenses, and we have two casinos within a twenty-minute drive of Shiloh Road. But neither of these casinos is in a residential neighborhood. Furthermore, I prefer Sonoma County tribes to have casino licenses, not a tribe like the Koi Nation that is from outside Sonoma County.

Drought conditions, fire evacuations, traffic congestion in a residential neighbor, scenic beauty in an agricultural area are all reasons to reject the proposed Koi Nation Resort and Casino Project.

Please reject this proposal. Thank you.

Sincerely,
Therese Menzel
1445 Golf Course Drive, Windsor, CA 95492

From: Sandra Arriola

Sent: Thursday, June 16, 2022 6:56 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] KOI NATION SHILOH RESORT AND CASINO PROJECT

To whom it concerns:

I strongly oppose the proposed casino in Windsor. I moved to Windsor in 1995 from Santa Rosa. I love Windsor and am so glad that I moved here and raised my three children. What I found that Santa Rosa didn't have was a strong close community. My kid's friend's parents were my friends. I belonged to a large church that was awesome and gave back to the community. Windsor is clean, safe, and family oriented. When I am in Windsor, I feel like I am far from Santa Rosa. That is about to end if the casino is allowed to be built. The casino will bring crime, drugs, drunks, prostitution, traffic, and the homeless. Windsor is already seeing more homeless move in. The couple of positives (if you find them positive) such as jobs and revenues do not outweigh the negatives. Windsor is not the place for this type of business. I see our home prices drop, and our safety and lifestyle be diminished by a casino. Windsor residents do not want this in their neighborhood!!!!

Do not turn our nice town of Windsor into a crime infested sin city!!!

Thank you,
Sandra Oakes-Arriola

From: Victoria Osten
Sent: Thursday, June 16, 2022 6:26 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard:

I am writing to express my opposition to the proposed casino to be located near Windsor, CA.

While my reasons are many, I will narrow this down to the top three concerns which I have:

1. Public Safety. This is particularly concerning as someone who had to evacuate during the Kincade Fire several years ago. With the addition of more much-needed affordable housing units, there would be even more of the general population needing to be served by police and fire, as well as many more people to evacuate in the event of an emergency.
2. Infrastructure and Roads. Closely tied to the item above is that there is not sufficient infrastructure, particularly roads, to handle the type of additional traffic which would result from the casino. Further, there is not enough room to widen the existing roads as the proposed site is surrounded by private property.
3. Drought and Water Rationing. We are in a severe drought and have been requested to ration water for household use. Any additional use of this precious resource should be saved for people who live and work in Sonoma County, including proposed much-needed affordable housing already in progress.

Please feel free to contact me with any questions.

Sincerely,

Victoria Osten

From: Carol Rash
Sent: Thursday, June 16, 2022 5:16 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation Shiloh casino and resort project

For your consideration

I am writing regarding the proposed Koi Casino and Resort in Windsor, California.

My husband and I have lived in Windsor since 1988 and have been pleased with the way our town has improved and grown since we moved in. The proposed Casino will be the largest in Northern California and will increase traffic and congestion in our area.

In 2019, we had to evacuate our town due to the Kincade Fire heading towards it. By Evacuating, our town was saved by the fire crews taking a stand. We had time for evacuation unlike many other towns that have been consumed by fires, but it took hours for an orderly evacuation because there are 2 main evacuation routes: US 101 and Old Redwood Highway. If the Casino is built and evacuation has to take place, the funneling of the extra people from the Casino could cost lives and cause more confusion. In a previous fire, the fire burned less than a mile of this proposed site.

We have been on drought water restriction this summer and previous drought years. The casino will have to drill wells which will lower the water table. We conserve water in our home, but visitors to the Casino and Hotel will not restrict their water use.

There are 2 other Casinos in Sonoma County and adding a third will not be a benefit for our area.

Please help our community by stopping this Casino from being built

Sincerely,

Carol Rash
180 Dartmouth Way
Windsor, CA 95492

June 16, 2022

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Region
2800 Cottage Way
Sacramento CA. 95825
email: amy.dutschke@bia.gov

Re: Koi Nation Shiloh Resort and Casino Project

Dear Ms. Dutschke,

As a resident of Windsor CA and along with most other residents that I know in the community I am opposed to the proposed Koi Resort and Casino. I feel it would be environmentally devastating to our town.

This casino would drastically affect our limited water supply, traffic, parking, property values, noise and power supply.

We are being threatened with rolling power blackouts and have already been asked to limit our power use to specific times.

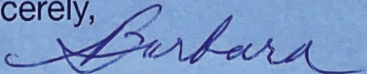
With regard to water we are presently in a drought with water use restrictions in our homes and businesses.

This proposed resort and casino would require both a heavy use of power and water which are already in limited supply.

This casino would have an extreme negative impact on our daily lives in this community!

I strongly oppose this Koi Casino Resort and Casino Project!
Thank you for your considerations of my comments.

Sincerely,



Barbara Reed
729 Kay Starr Court
Windsor, CA. 95492

cc: Chad Broussard, Environmental Protection Specialist Bureau of Indian Affairs
chad.broussard@bia.gov

cc: TribalAffairs@sonoma-county.org

From: Vincent Stockette
Sent: Thursday, June 16, 2022 10:42 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Viki Stockette <vstockette@sbcglobal.net>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Chad Broussard:

I struggle to understand how the Koi nation's proposed resort in Sonoma County, within the limit of the City of Santa Rosa and just South of the Town of Windsor, will not have a detrimental impact on the environment of Sonoma County.

If the Koi nation were to propose a rancheria like the Lytton Pomo to enable them to live well within the county, I would not feel the impact would be as significant. Such a development would probably pace the county's growth model. But, a resort to bring in thousands of daily tourists to a gaming location seems unreasonable. How will the following environmental impacts be mitigated or avoided:

- Limited water resources during what agencies of the federal government describe as an enduring super drought.
- Fire safety impacts including a hazard to the evacuation of county residents North and East of the proposed site.
- Traffic congestion and noise on both US 101 and the narrow corridor of Old Redwood Highway. The later of which is used for local transit of families with school-age children to deliver them safely and in a timely manner to school and after school activities. Such usage diminishes congestion on US 101. A resort in this area will force local traffic onto US 101.
- An increase in idle traffic on US 101 as it is forced through the bottle neck that will be created by increased traffic headed towards Windsor as the lanes diminish from a six lane highway to four lanes.

I ask that the Bureau demonstrate good judgment in rejecting the transfer of this land to trust due to its proposed usage and its inevitable and detrimental environmental impacts.

Sincerely,

Vincent Stockette
10809 Rio Ruso DR
Windsor, California 95492

laudato si, mi signore, per sor acqua
la quale è multo utile et humile
et pretiosa et casta

From: Marilyn Volpert
Sent: Thursday, June 16, 2022 1:09 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear ladies and gentlemen of Koi family, I truly believe that you will push the people of Sonoma County into a foreseeable disaster. You want to build in a family town? Across from a well used City park?

This isn't a huge town with a large non residential area, like Rohnert Park.

We are already needing WATER! And less traffic on narrow family streets. Evacuation during a wildfire could be disastrous!

We wish our Native Americans well, always, but pushing this project, if one thinks it through, isn't going to help you cause.

Thank you for reading and considering the future of current Windsor family safety.

Signed, a registered voter,
Marilyn Parsons-Volpert 8085 A Street, Windsor, California 95482

From: Judy Witwicki

Sent: Thursday, June 16, 2022 6:07 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Hello I am a 40 year resident of Sonoma County. I highly oppose this plan for many reasons most if not all that I am sure you have already heard about.

A casino should just not be in this location. Drive around it, look around it. There are so many more appropriate places in our area for a casino. This is a neighborhood with homes, churches and schools nearby. A casino just does not fit. It is just not the right thing to do.

I am not going to copy and paste the dozens of specific reasons because I know you know them all already. My only plea is to hear and understand that this location simply is not the right one for a casino.

Thanks for listening.

Regards,

Judy Witwicki

5370 Sonoma Mountain Road
Santa Rosa, CA. 95404

From: Tisha Zolnowsky
Sent: Thursday, June 16, 2022 5:15 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

I cannot comprehend how anyone would think that adding a massive casino in a neighborhood is OK. Why are we even talking about this, it's absurd for so many reasons.

I don't understand why any organization would put profit before population safety. Sadly, politics and things like this are driven and bought by money. The little guy (residents) never seem to win against billionaires.

If this project goes through, will we look back and wonder how we got into a situation where the tiny town of Windsor burned up because the people were trapped by traffic? **Who will be blamed** for all the **deaths by fire** because of the inability to evacuate? The last evacuation took me four hours to leave Windsor, CA. Windsor, CA, is the wrong location for a business that will add more traffic and people than the 26,000 residents.

Yes, a massive project like the proposed casino will destroy the beauty and increase traffic, congestion, and crime in a residential area, but most of all, it will more than double the people in an area that is already challenged with the ability to evacuate in a safe, timely manner.

There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals from another California region.

I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

So many other **logical** issues that should not be pushed aside... Again, how is this project even an option?? Seriously, our world is going to shit because things like this are even entertained. OMG People, do something!

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling

vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location -

study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and

entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction

of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the

impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential

flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project with be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of

20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established

residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel.

Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing

businesses in this area and case devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the

valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

From: C. Belden

Sent: Friday, June 17, 2022 12:29 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Request to extend public response period for Koi Nation Shiloh Resort and Casino project

Hello Mr. Broussard,

I am requesting that the public scoping response time for the submission of comments be extended because the time period from May 27 includes two major holidays - Memorial Day and Juneteenth.

Many people are out of their offices and on vacation due to these two holidays. The 30-day public response time is SIGNIFICANTLY adversely impacted by these two holidays.

I represent a large group of local residents and we are not able to contact many in the community because offices have been closed and staff have been on vacation over Memorial Day and for Juneteenth.

The two holidays have compounded the difficulty to contact important local community groups. It is not fair or right that the public's ability to submit their concerns to the BIA be impacted by these two long "weekend" holidays. The public's response time should be extended due to the timing of the notice.

Thank you for your attention to this request on behalf of a very large community of local residents.

Respectfully,
CBelden

From: John Baird
Sent: Friday, June 17, 2022 3:55 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation resort and casino

As a retired person living at 1200 Leslie rd in healdsburg ca , Sonoma I am 100% against a resort and casino being built in this residential neighborhood.there are already two casinos within 10 miles of the proposed site .

To: The Bureau of Indian Affairs,

Please confirm receipt of the correspondence.

Myself and most community members vehemently oppose this proposed casino site.

As you can see in the map below, the proposed site sits in direct contact with numerous neighborhoods (yellow shaded), two churches (blue shaded), two parks and a school (green shaded). Also notice, that their rendering photo is far from scale in relation to the proposed parcel. The proposed casino is will be built on the pink shaded area within the red outline, directly adjacent to many family homes.

The property that the Koi Nation has purchased is currently two parcels (red outline); with an estate home with vineyards on one parcel and all vineyards on the second (shaded in pink). The renditions published on the Koi Nation website are proposing a \$600 million project. It will include: a 2,500-gaming machine facility, 200 room hotel, six restaurants and food service areas, conference meeting space and spa. It will have 1,100 full-time employees, operate 24 hours a day, 7 days a week. The vehicle and charter bus traffic will be significant in volume and 24 hours a day. Also note that the rendition does not depict the acres and acres of parking which will be necessary to support such a large facility, employees and customers.

This development will flood the current community with traffic, generate tremendous amounts of light and noise and most likely result increased crime. Lights from the parking lot will bath neighboring homes with bright light, every and all night. It is a massive development that does not belong here.

The other obvious concerns include lack of water and fire evacuation congestion in case of an emergency. This area has been evacuated two separate times over the last four years. We are now into our third year of mandatory water rationing.

After some informal research I have **not** been able to find one current major casino in the state of California that has a direct, immediate impact on a surrounding residential area. According to a Google search, the proposed Koi Nation casino will rank #6 in the state for number of slot machines. While the overall gaming space has not been disclosed, comparable casinos range between 74,000-130,000 square feet in floor gaming space. The total proposed development is reported to span 1.2 million square feet. Cache Creek Casino and Resort, Brooks, CA; Viejas Casino and Resort, Alpine, CA; Redhawk Casino and Resort, Placerville, CA; all comparable casinos are located far away from any major surrounding residential areas. Please see comparable casinos and maps at the bottom of this attachment.

From what I have researched, there is no precedence, none, of a major casino in the state of California being built adjacent to a residential area as the Koi Nation are proposing. Despite the Koi's claims, this is not a rural area, this is an area full of residential neighborhoods, schools, churches and parks. This is a massive development that will literally cast shadows across residential homes. The scope and scale of this project is inappropriate for such an area.

The Koi Nation have already attempted to build casinos in Oakland, close to the Oakland International Airport and Vallejo on Mare Island. Why have they failed in their previous attempts? Both of those locations would have had almost zero impact on surrounding residential areas. The reason is that they were unable to prove those areas fell within their historical lands, the same is true of this location as well.

There has been much discussion about the veracity of the true homeland of the Koi tribe. From all accounts their true homeland is in Lake County, in the Clearlake area. They are contending the proposed location is within 10 miles tribal lands. I believe this is less than truthful, from piecing together various statements, they are claiming this part of Sonoma County was part of their migratory area so that means the site is within 10 miles of the trade routes their ancestors traveled. This seems to be a very loose and deceptive claim to this area being part of the traditional grounds. Growing up in Sonoma County I was always taught that this was the Pomo Indian tribe's ancestral grounds. So, I ask the question, why are the Koi Nation being allowed to build a casino so far from their traditional homelands?

There are also two other major casinos within 20 minutes, one north and the other south.

Myself and several other homeowners have been told by prospective agents and buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. My home sits less than 40 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Just last week one agent regrettably told me that my home is unsellable. Please study how decreases in home values will affect homeowners.

Lastly, if you look at the highlighted map, my home of 23 years sits directly adjacent to the parcel in question, less than 40 feet from the proposed buildings. Needless to say, this development will destroy our quality of life. The light, noise, buses and cars, 24 hours a day will be unbearable. Now with the published proposal, the value of my property has been decimated and our ability to relocate somewhere

else in Windsor or the surrounding Sonoma County area, to a similar home, is now most likely out of our financial means. My wife has been an elementary school teacher in the Windsor Unified School District for over 20 years, if we are even about to sell our home, we are saddened at the prospect of having to move after all of these years. This project will financially and emotional ruin many lives.

I hold no ill will towards the Koi Nation but please deny the Koi's request to put **this specific property** into trust, thus resulting in one of the largest casinos in the state of California, being built amongst family homes.

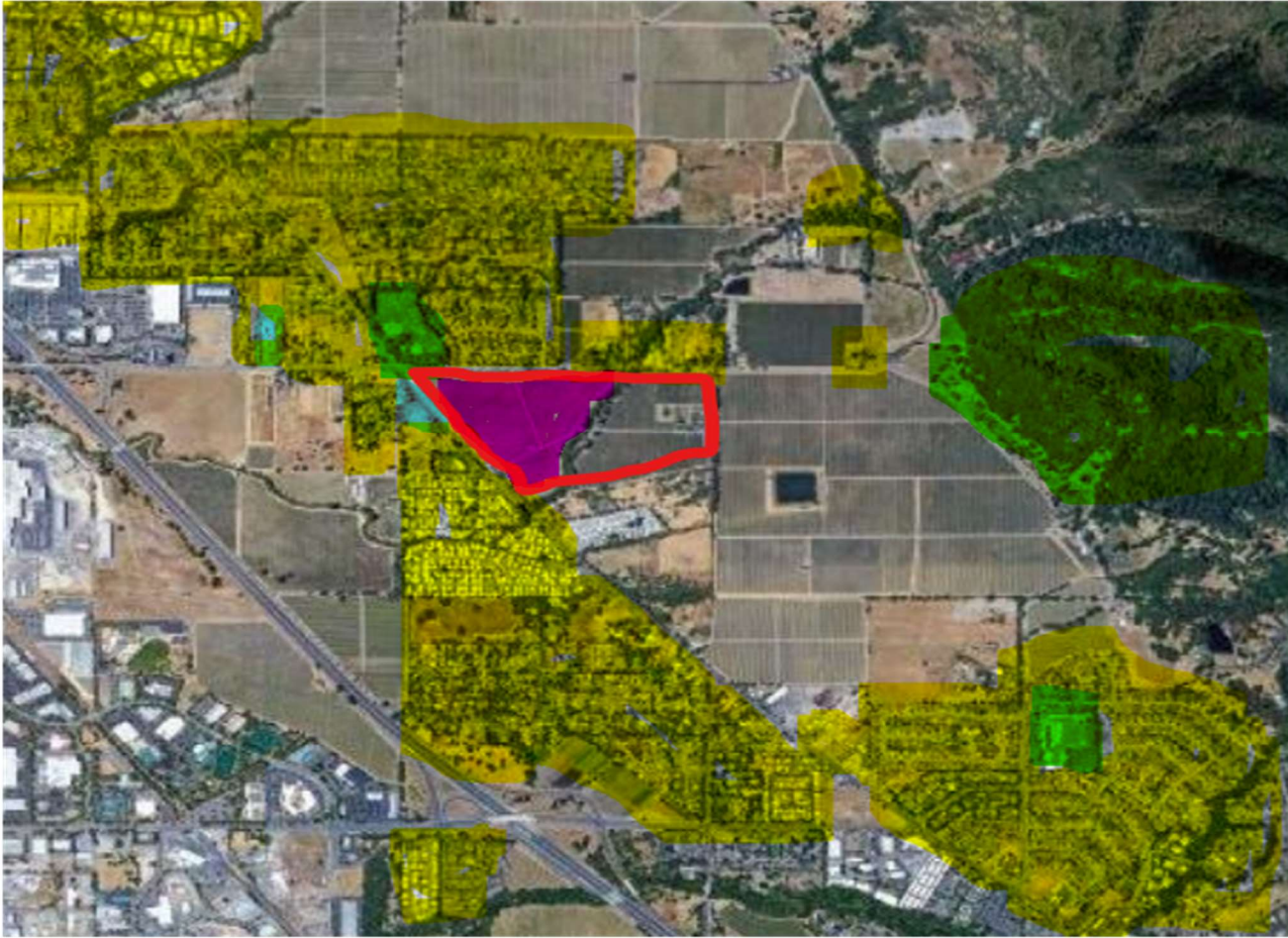
Please review the images and maps I have included below and notice that all casinos of a similar size of this proposal **do not** border upon residential neighborhoods and parks.

I respectfully ask you to study these specific concerns as well as the others brought before you by my fellow community members.

Kind regards,
Paul and Stephanie Browning
243 Lea St., Windsor, CA 95492
(707) 479-4508

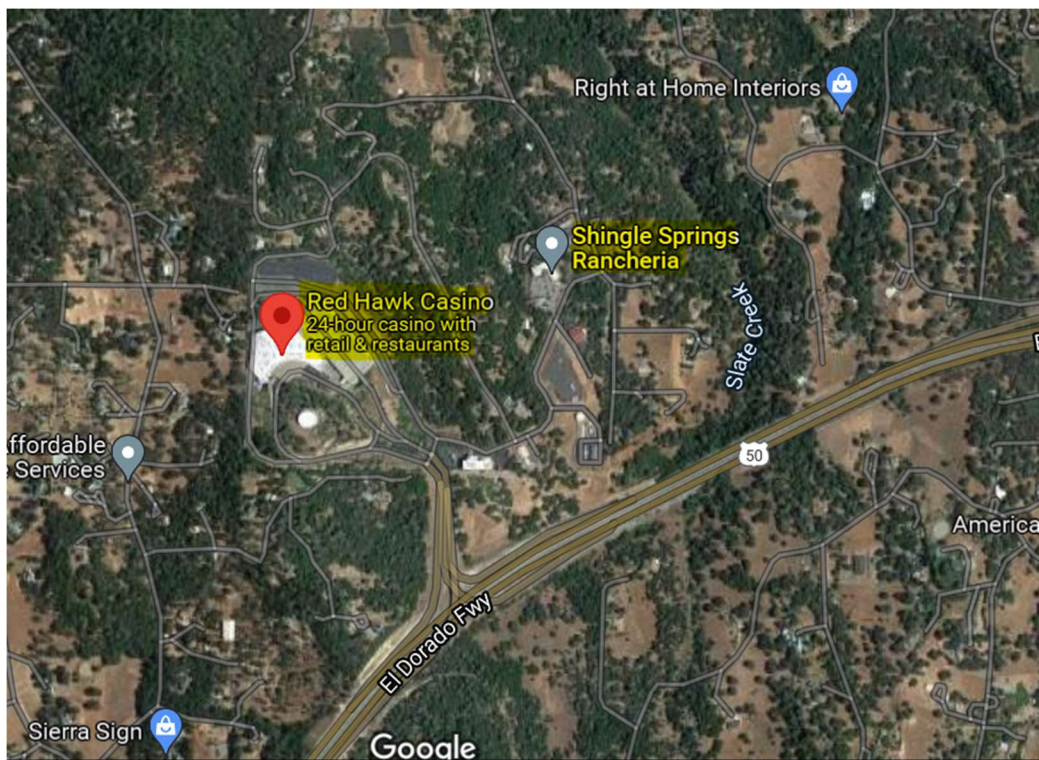


Shiloh Resort & Casino rendering courtesy of Koi Nation Sonoma

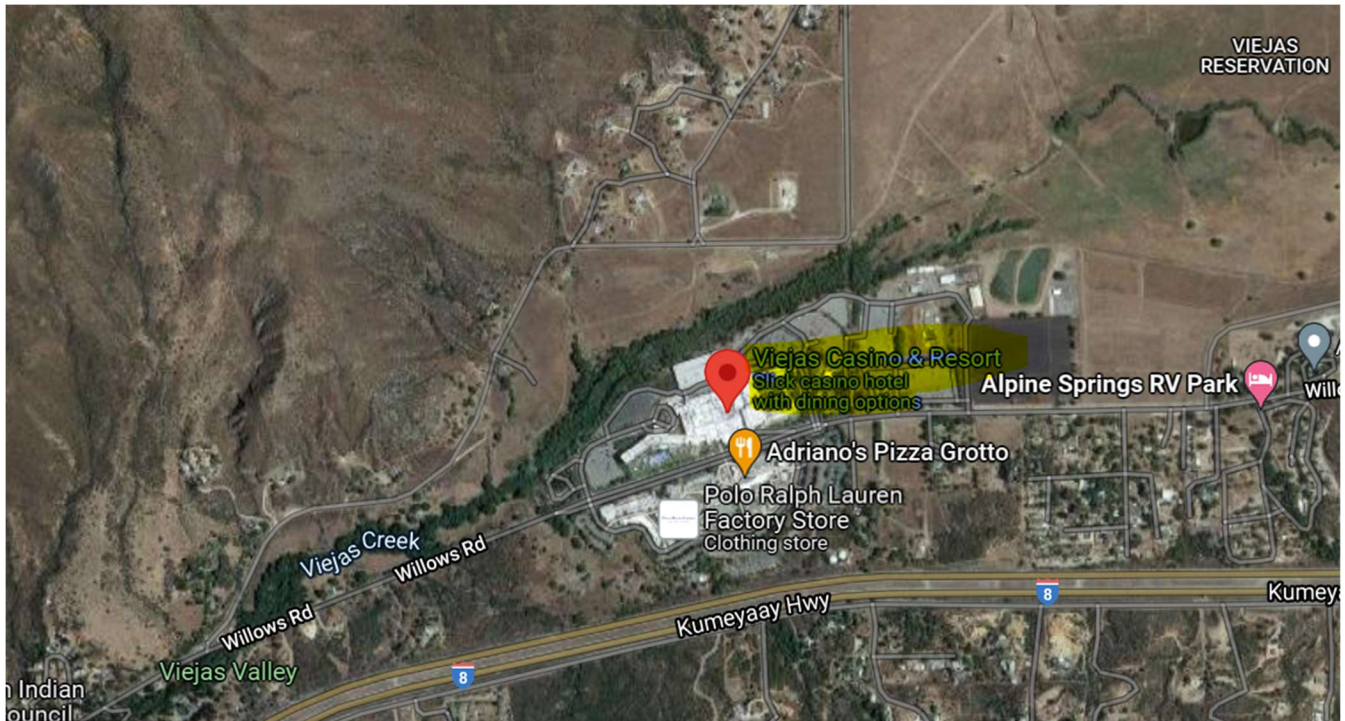




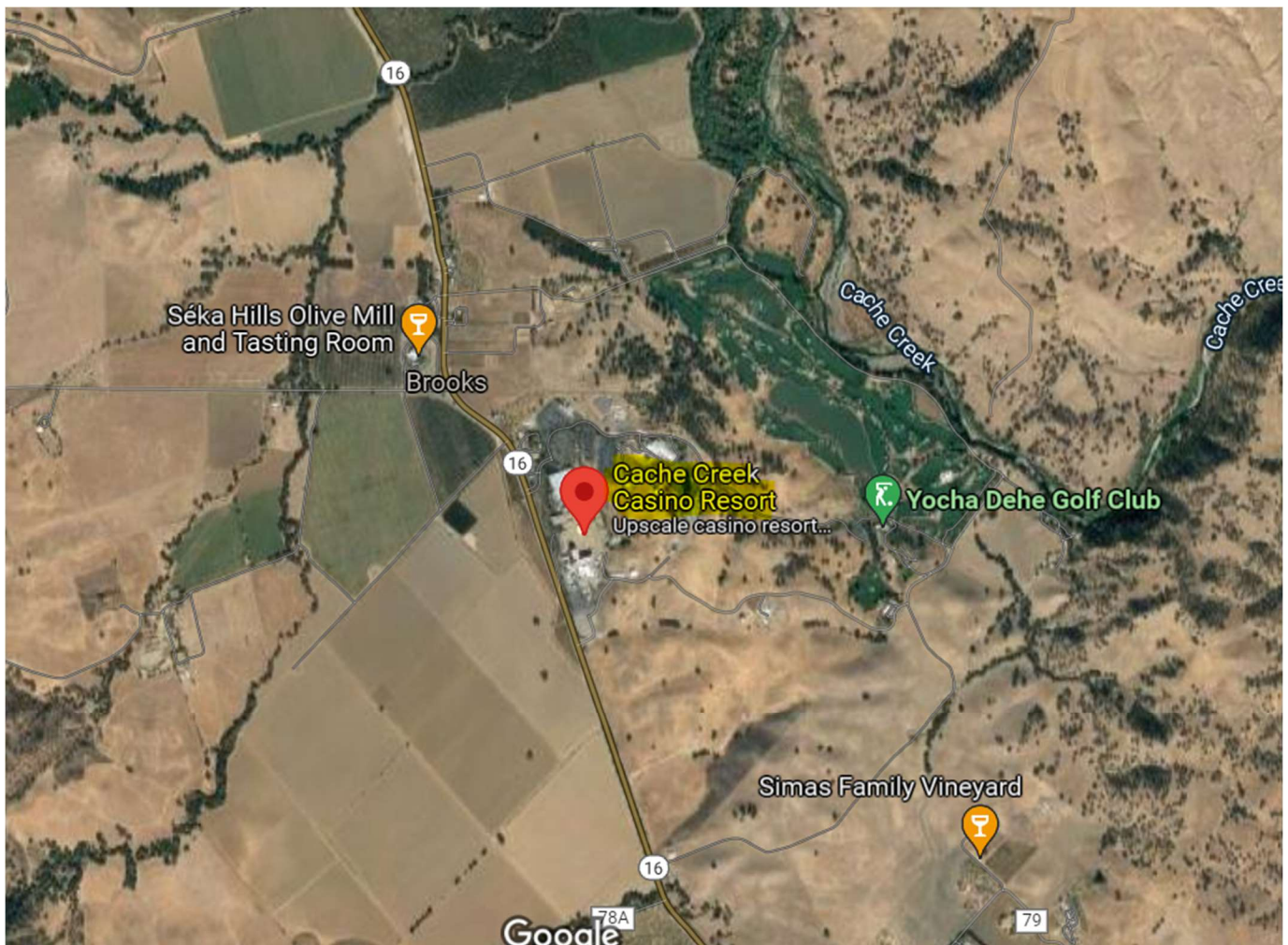
Redhawk Casino and Resort:



Viejas Casino and Resort:



Cache Creek Casino and Resort:



5. Cache Creek Casino Resort



#5 CACHE CREEK CASINO RESORT

14455 CA-16, Brooks, California 95606-0065 (800) 452-8181

Slot Machines: 2,700

Floor Size: 74,720 square feet

Table Games: 120 | Poker Tables: 14

Cache Creek Casino Resort is located 40 miles west of Sacramento in Brooks, California. The casino features ten restaurants, the Yocha Dehe Golf Club, and two four-star hotel towers with 659 rooms. [More information](#)

6. Viejas Casino & Resort



#6 VIEJO CASINO & RESORT

5000 Willows Road, Alpine, California 91901-1656 (800) 847-6537

Slot Machines: 2,500

Floor Size: 130,000 square feet

Game Tables: 50; Poker Tables: 22

Viejas Casino & Resort is located 35 miles east of San Diego in Alpine, California. Viejas features seven dining venues, an entertainment theater, a bowling alley, factory outlet stores and two AAA Four Diamond hotels. [More information](#)

7. Red Hawk Casino



#7 RED HAWK CASINO

1 Red Hawk Boulevard, Placerville, CA 95667 (888) 573-3495

Slot Machines: 2,500

Floor Size: 88,000 square feet

Table Games: 75 | Poker Room: 7 tables

Red Hawk Casino is located 30 miles east of Sacramento in Placerville, California. The casino features three restaurants and a food court, a Kids Quest entertainment center, fuel station and convenience store, and a 50-room hotel (2022). [More information](#)

From: Paul Browning
Sent: Friday, June 17, 2022 2:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Proposal

Mr. Broussard,

I did have one question. Why is the public comment period only 30 days and why was it not broadly communicated? The fact that I was able to make comments regarding this matter was just brought to my attention 3 days ago. Such a significant project with long ranging impacts, should allow for as much community feedback as possible but to do so it should be broadcast via all media sources to facilitate thorough community engagement.

Also, please be sure my attachment and email are also forwarded to Ms. Dutschke.

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Kind regards,
Paul Browning

From: Brenda Catelani
Sent: Friday, June 17, 2022 1:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk

and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20

million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpermitsonoma.org%2FMicrosites%2FPermit%2520Sonoma%2FDocuments%2FPre->

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RkLquxAKOScAZecXZ708Vz24%3D&reserved=0](#)

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the

increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer

evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be

a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact

stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project’s alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project’s alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of

EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County.

Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor’s Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been

supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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Thank you for considering my comments.

Brenda Catelani
5842 Leona Court, Windsor, CA 95492

From: Geoff Coleman
Sent: Friday, June 17, 2022 7:51 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Chad,

I am writing today to express concern, as a 38-year resident of Sonoma County, a registered professional engineer, a licensed land surveyor and college engineering/land planning professor, about the casino proposed along east Shiloh Rd in the unincorporated area of Sonoma County. I am not opposed to the concept of a casino, but am bewildered how any responsible entity could consider urban development at this location, let alone a casino of this magnitude. This is a selfish and blatant disregard to the environment, neighborhood and our community.

The County of Sonoma and Town of Windsor, which this proposed monstrosity of a development borders, have active policies in place that prohibit development of this nature. The land use designation in the Sonoma County General Plan "Land Intensive Agriculture" was created to enhance and protect lands best suited for permanent agricultural use. These policies are established to promote responsible growth and prevent urban sprawl in accordance with the Local Agency Formation Commission's (LAFCO) policies.

It would be an irresponsible violation of these policies and completely inappropriate to build a casino in a residential area with our families and schools, inviting crime, drugs and prostitution, particularly when the residents of Sonoma County relied upon these policies and the actions of our Board of Supervisors approving them when purchasing their homes and nesting in this area. A development of this nature is not allowed under the California Environmental Quality Act (CEQA) and would not be permitted if proposed by any other entity, so I'm astonished that this is even being considered. In summary:

- The casino would bring crime, drugs and prostitution, threatening the safety of our community and degrading property values.
- The casino would introduce unwelcome noise, odors and light pollution which violate the County's policies.
- Shiloh Road is currently operating at a Level of Service of "D". The Press Democrat noted that the casino would bring 1,100 employees and draw 20,000 people a day, degrading the Level of Service to an unacceptable level.
- California now evaluates the environmental impact of a development based on the number of vehicle miles traveled when accessing a facility (VMT). Adding 1 vehicle a day for an unplanned land use would violate this policy. The casino will bring 20,000 people a day, substantially increasing VMT and greenhouse gas emissions.
- Shiloh Road is planned as a 2-lane road with a single travel lane in each direction in the Town of Windsor's governing documents. Development is progressing along this corridor based on traffic counts supporting this configuration. Most roads in Sonoma County are built by the developments fronting them. It would be an unfair burden for the Town to require all property owners along Shiloh Road to give up right of way, and build a wider road as a condition of development, purely to benefit the casino.
- Sonoma Water and the Town of Windsor provide sewer service to the unincorporated area of Sonoma County and the residents of the Town. Their facilities do not extend, nor were they ever planned to accommodate the waste discharge from the casino. Therefore, the casino would have to build their own sewage treatment plant in the back yards of our residents, bringing unsightly facilities and unwanted odors.
- The Town of Windsor and California American Water provide potable water service to this area for drinking, irrigation and fire protection. Their facilities do not extend to, nor were they ever planned to serve

this site. Therefore, the casino would have to drill their own well(s) and further diminish groundwater supply in this area. California American Water uses wells in this area to serve the existing residents and would be forced to compete for this water, drilling deeper wells and passing these costs along to existing residents.

➤ The casino is proposed immediately adjacent to a Wildland Urban Interface Area (WUI). We have observed two devastating fires in this immediate area in the last 5 years. Residents attempting to flee their homes during the Tubbs fire, which took more than 5,600 structures in a matter of hours, were grid-locked in traffic trying to lead their families to safety, down the only viable evacuation route for many local residents. The Casino will eliminate an existing agricultural greenbelt and provide additional strain on our roads and ability to seek refuge during emergency events.

➤ Although Sonoma County residents are in dire need of housing, Permit Sonoma won't allow a residential lot to be split to build another home within a WUI area as a life/safety precaution, but these folks want to build a casino?

➤ The local water supply network is designed to provide approximately 1,500gpm for firefighting. California American Water's tanks ran dry when fighting the Tubbs fire. A development of this magnitude having wood framed construction would require a flow rate of 8,000gpm (4,000gpm for sprinklered buildings). The local water purveyors don't have the capacity for this or the infrastructure to support this flow rate. Therefore, the casino will need to build their own tank or tanks which may require more than 500,000 gallons of water if computed using NFPA1142. However, this code wasn't intended to be used for sizing firefighting facilities in an urban design setting. When considering the California Fire Code, the water tank storage requirement could approach 1 Million gallons, even for sprinklered buildings.

➤ Pruitt Creek traverses the proposed casino property. Even if the property could be developed, our local land development policies require that the creek be preserved and enhanced with landscape and development be setback from the creek.

➤ Sonoma Water, our local flood control agency and the Town of Windsor, in their Stormdrain Master Plan, identify Pruitt Creek as being incapable of handling the design storm event. The existing mobile home park and other downstream residents already experience flooding during inclement weather. The northbound Shiloh Road off ramp at Hwy 101 also floods and experiences closures on a regular basis. Substantially increasing the amount of impervious surface upstream, at this site, will add runoff and create exacerbate flooding. A development this size might generate as much as 100 cubic feet of water per second which is approximately 45,000 gallons per minute. This might require a 2-acre detention basin to help offset and mitigate the additional runoff, inviting mosquitos and other vector borne diseases.

➤ The Russian River and its tributaries, including Pruitt creek are listed as impaired water bodies under the Clean Water Act. The State of California requires that development draining to these tributaries treat and infiltrate stormwater. A development this size could require 4-acres of bioretention, aside from the requirement to temporarily detain the peak runoff to help mitigate flooding.

As may be gleaned from the summary above, Shiloh Road is the wrong place for a casino, creating an unsafe environment for our residents on multiple levels.

Respectfully,

Geoff Coleman PE, PLS, CDT

June 17, 2022

Representatives for Sonoma County,

I am writing today to express concern, as a 38-year resident of Sonoma County, a registered professional engineer, a licensed land surveyor and college engineering/land planning professor, about the casino proposed along east Shiloh Rd in the unincorporated area of Sonoma County. I am not opposed to the concept of a casino, but am bewildered how any responsible entity could consider urban development at this location, let alone a casino of this magnitude. This is a selfish and blatant disregard to the environment, neighborhood and our community.

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It would be an irresponsible violation of these policies and completely inappropriate to build a casino in a residential area with our families and schools, inviting crime, drugs and prostitution, particularly when the residents of Sonoma County relied upon these policies and the actions of our Board of Supervisors approving them when purchasing their homes and nesting in this area. A development of this nature is not allowed under the California Environmental Quality Act (CEQA) and would not be permitted if proposed by any other entity, so I'm astonished that this is even being considered. In summary:

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- California now evaluates the environmental impact of a development based on the number of vehicle miles traveled when accessing a facility (VMT). Adding 1 vehicle a day for an unplanned land use would violate this policy. The casino will bring 20,000 people a day, substantially increasing VMT and greenhouse gas emissions.

- Shiloh Road is planned as a 2-lane road with a single travel lane in each direction in the Town of Windsor's governing documents. Development is progressing along this corridor based on traffic counts supporting this configuration. Most roads in Sonoma County are built by the developments fronting them. It would be an unfair burden for the Town to require all property owners along Shiloh Road to give up right of way, and build a wider road as a condition of development, purely to benefit the casino.
- Sonoma Water and the Town of Windsor provide sewer service to the unincorporated area of Sonoma County and the residents of the Town. Their facilities do not extend, nor were they ever planned to accommodate the waste discharge from the casino. Therefore, the casino would have to build their own sewage treatment plant in the back yards of our residents, bringing unsightly facilities and unwanted odors.
- The Town of Windsor and California American Water provide potable water service to this area for drinking, irrigation and fire protection. Their facilities do not extend to, nor were they ever planned to serve this site. Therefore, the casino would have to drill their own well(s) and further diminish groundwater supply in this area. California American Water uses wells in this area to serve the existing residents and would be forced to compete for this water, drilling deeper wells and passing these costs along to existing residents.
- The casino is proposed immediately adjacent to a Wildland Urban Interface Area (WUI). We have observed two devastating fires in this immediate area in the last 5 years. Residents attempting to flee their homes during the Tubbs fire, which took more than 5,600 structures in a matter of hours, were grid-locked in traffic trying to lead their families to safety, down the only viable evacuation route for many local residents. The Casino will eliminate an existing agricultural greenbelt and provide additional strain on our roads and ability to seek refuge during emergency events.
- Although Sonoma County residents are in dire need of housing, Permit Sonoma won't allow a residential lot to be split to build another home within a WUI area as a life/safety precaution, but these folks want to build a casino?
- The local water supply network is designed to provide approximately 1,500gpm for firefighting. California American Water's tanks ran dry when fighting the Tubbs fire. A development of this magnitude having wood framed construction would require

a flow rate of 8,000gpm (4,000gpm for sprinklered buildings). The local water purveyors don't have the capacity for this or the infrastructure to support this flow rate. Therefore, the casino will need to build their own tank or tanks which may require more than 500,000 gallons of water if computed using NFPA1142. However, this code wasn't intended to be used for sizing firefighting facilities in an urban design setting. When considering the California Fire Code, the water tank storage requirement could approach 1 Million gallons, even for sprinklered buildings.

- Pruitt Creek traverses the proposed casino property. Even if the property could be developed, our local land development policies require that the creek be preserved and enhanced with landscape and development be setback from the creek.
- Sonoma Water, our local flood control agency and the Town of Windsor, in their Stormdrain Master Plan, identify Pruitt Creek as being incapable of handling the design storm event. The existing mobile home park and other downstream residents already experience flooding during inclement weather. The northbound Shiloh Road off ramp at Hwy 101 also floods and experiences closures on a regular basis. Substantially increasing the amount of impervious surface upstream, at this site, will add runoff and create exacerbate flooding. A development this size might generate as much as 100 cubic feet of water per second which is approximately 45,000 gallons per minute. This might require a 2-acre detention basin to help offset and mitigate the additional runoff, inviting mosquitos and other vector borne diseases.
- The Russian River and its tributaries, including Pruitt creek are listed as impaired water bodies under the Clean Water Act. The State of California requires that development draining to these tributaries treat and infiltrate stormwater. A development this size could require 4-acres of bioretention, aside from the requirement to temporarily detain the peak runoff to help mitigate flooding.

As may be gleaned from the summary above, Shiloh Road is the wrong place for a casino, creating an unsafe environment for our residents on multiple levels.

Respectfully,



Geoff Coleman PE, PLS, CDT

From: Michael Cote
Sent: Friday, June 17, 2022 8:33 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Building a casino resort in a habitat corridor and adjacent to residential neighborhoods is inappropriate.

Wildlife and Habitat Conservation - As a frequent visitor to parks throughout the Mayacamas Mountain Range, I've been fortunate to see a wide variety of wildlife in their habitat. As climate change progresses, the green-belts surrounding and connected to this range must be protected to maintain the resilience of the ecosystem. The creeks that run through the proposed casino resort property support wildlife including river otter. Wildfires in 2017 and 2019 destroyed habitat within short distances of the proposed casino resort, property that is intimately connected to the adjacent forest. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Drought - Of the last eleven years Sonoma County had endured 8 years classified Abnormally Dry, 6 years of Moderate Drought, 3 years of Severe Drought, and 1 year of Extreme Drought (<https://droughtmonitor.unl.edu/CurrentMap.aspx>). Growth and water use impacts in the area must be carefully considered and managed responsibly. Please study the risk to the community and ecosystem from drought and the impact of placing a casino resort in this area.

Infrastructure - I grew up in the Santa Clara Valley in the 1960's and watched agricultural land converted to asphalt. Roads were widened and massive intersections were built to collect traffic. Not a single orchard remains in the area I grew up. Today I live along East Shiloh Road. A two-lane road lined with oak trees that serves the residents of the area. Also adjacent to the proposed casino resort is Old Redwood Highway which connects the small community of Larkfield to the town of Windsor. We expect increased traffic as the communities grow naturally but a casino resort will accelerate natural traffic issues beyond acceptability. My personal experience with multiple wildfire evacuations in the area are cause for great concern. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site. Thank you for considering my comments.

Michael Cote
mike.cote@sbcglobal.net

From: Robert Eberling
Sent: Friday, June 17, 2022 6:38 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] RE: Koi Nation Shiloh Resort and Casino Project

Chad Broussard
Environmental Protection Specialist
BIA Pacific Region
2800 Cottage Way
Sacramento California 95825
RE: Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opened on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Drought – 2022 is the third year in a row of historically many droughts for this area and is part of the increasing fire risk of this area. The drought continues to increase the number of and intensity of fires, and lower the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer in this area.

Fire Evacuation Routes – Historically this area has regular wild fires. In the past 5 years, two devastating urban/wildland interface fires swept through this area. The Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the then current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 cars to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

No Protection of homes in danger of burning from wildfire by First Responders- East Shiloh Road, a two lane road, is the only way people can evacuate

Oak Park. It is the same road that has to be used by first responders and their fire trucks to get to the houses that are on the edge of the suburban/wildland interface in Oak Park. The houses on this interface are on the east side of Mathilde Drive. The presence of First Responders and their equipment on Mathilde Drive during the 2019 Kinkaid fire saved Oak Park. East Shiloh Road would be blocked by buses, trucks and cars evacuating from the casino/resort making access to Mathilde Drive by First Responders slow if not impossible.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Vehicles driving and parking on the property will leak fluids including but not limited to gasoline, oil, brake and transmission fluid into the parking and flow into the creeks and therefor the groundwater. The creeks and groundwater will also be polluted by trash floating in rain runoff and flying in the air from the wind blowing through the parking lot. The plastic that is component of this garbage will fill Pruitt Creek and leach into the groundwater. Please study the adverse effects from these sources of contamination to groundwater and the impact on individuals and agricultural users of well water who rely on pure water to maintain their organic certification.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods 2) in areas specifically zoned for residential/ agricultural use only (not commercial use) where development is regulated for the benefit of all the residents of the County. 3) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 4) built in rural areas isolated from established residential communities. 5) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos) 6) built with a single purpose transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the large size of this gambling casino resort at this location will cast a large shadow upon the local landscape and local family life activities, overwhelm the resources of the public services, ruin the safe fun of Esposti Park and safe quiet of Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Thank you for considering my comments.

Robert Eberling
32 Plymouth Way
Santa Rosa, Ca 95403

From: Bonnie Farrow
Sent: Friday, June 17, 2022 9:10 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Chad Broussard
Environmental Protection Specialist
BIA Pacific Region
2800 Cottage Way
Sacramento California 95825

RE: Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opened on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

The following are some of my concerns.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business like this project. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the inevitable local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all

phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, also from delivery trucks and other commercial vehicles during the project's daily operations. Please include the impact of thousands of buses, shuttles, and other passenger vehicles that will make a major impact 24/7/365.

The EPA has found that people who live, work or attend school near major roads have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. A project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the public health impact due to an increase in irritating and toxic particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhoods Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings built on the property, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during the construction years and after completion as a consequence of the impact of noise from traffic. Especially loud will be the engines of muscle cars which will be raced to make the car's tires squeal—read sideshows, slang for a demonstration of car stunts. Also partying drunk people will scream and talk loud and possibly shoot guns if angry on and off the Koi property. And then there will be the constant noise of ordinary traffic. Also study how pollutants and dust (particulate matter) from the thousands of cars and buses accessing the commercial facility 24/7/365 will affect property values.

Please study how loss of public safety will impact property values. For example the following safety items will make an area less desirable. A slower or totally clogged wildfire evacuation route due to too many cars using a two lane road that can not be widened. Intoxicated driving and resultant accidents. Senior citizens being unable to drive to the store and appointments because of the heavy traffic on Shiloh and Old

Redwood. Crime directly on the casino property and in/around neighboring streets, residences, businesses, churches and parks perpetrated by gamblers.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods 2) in areas specifically zoned for residential/ agricultural use only and not commercial use 3) where development is regulated for the benefit of all the residents of the County. 4) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 4) built in rural areas isolated from established residential communities. 5) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 6) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, disturb the safety and peace of Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the neighboring communities of Windsor and Santa Rosa.

Amplification of Noise - Please study the loudness of the noises from a casino resort, its entertainment activities including unofficial entertainment such as sideshows in the parking lot and/or parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic 24/7/365 on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills which have private residences and the sound will be funneled to and amplified significantly by the hills.

Bike Races, Rider, Tours - This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the high volume of traffic that a casino will generate to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions - A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric

tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 3 miles of this proposed site. Traffic is already gridlocked during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran two blocks away across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing gambling addicts to an residential area who have a need for a increased revenue stream increases theft. Providing unlimited alcoholic beverages to people who drive away, increases drunk driving. A center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the safety and welfare of the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino.

This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into/next to residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a dam failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the estimated duration of construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, with such a high number of people into a area of such high fire risk, that is also a residential family neighborhood. The death and destruction to the community will be manifold. Death by (an increasing number of) fires caused by inability to evacuate. Destruction of local resources such as wildlife, creeks and endangered Valley Oak trees. The on-going and increasing drought will make this project a intolerable burden on the local aquifer and local grape growers whose wells will run dry. Drunk drivers will plague us. Individuals and business will experience financial loss through property devaluation and increases in property insurance rates due to an increase in crime and fire hazard due to lack of safe evacuation and fire services access

route to the project's neighboring communities during wildfires. In addition to the insurance rate increases because of increased crime, crime itself will create increases in security costs as homeowners and businesses and churches will purchase alarms, security bars on windows and doors, iron fences around the front perimeter of properties, security cameras and guns for protection. This is what a business that promotes vice brings to its neighboring communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a row of historically many droughts for this area and is part of the increasing fire risk of this area. The drought continues to increase the number of and intensity of fires, and lower the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer in this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and are in isolated, rural areas.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true

impact to the local economy, including taking business away from the truly local indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times and the financial burden on local services and

therefore taxpayers - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets; East Shiloh Road and Old Redwood Highway. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock. Please also report on the demand on and cost of local police and fire services for the Koi Resort and Casino. These costs will be shouldered by the property taxpaying people of Windsor, Santa Rosa and Sonoma County.

Fire Evacuation Routes – Historically this area has regular wild fires. In the past 5 years, two devastating urban/wildland interface fires swept through this area. The Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the then current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 cars to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

No Protection of homes in danger of burning from wildfire by First

Responders- East Shiloh Road, a two lane road, is the only way people can evacuate Oak Park. It is the same road that has to be used by first responders and their fire trucks to get to the houses that are on the edge of the suburban/wildland interface in Oak Park. The houses on this interface are on the east side of Mathilde Drive. The presence of First Responders and their equipment on Mathilde Drive during the 2019 Kinkaid fire saved Oak Park. East Shiloh Road would be blocked by buses, trucks and cars evacuating from the casino/resort making access to Mathilde Drive by First Responders slow if not impossible.

Fire Danger Increase – As more people move into the wildland, urban interface the dangers from fires increase. Curb and gutter fires that used to be unheard of twenty years ago, are now happening all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Wild fire analysis officials have determined that the neighborhoods surrounding

the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard for the proposed project.

Wildfires are a real Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from wild fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site which have no protecting vineyards. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations cause gridlock and in the case of the Tubbs fire were impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock by fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can not evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then the number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the reduction of the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site with it's vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats, quail and a variety of reptiles and amphibians migrate through the site of the proposed project

(currently vineyard) to and from Pruitt Creek in search of food and increasingly scarce water. Pruitt creek is designated as critical habitat for fish and for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife. Pay particular attention to channelization of Pruitt Creek due to landscaping and building footprints. Trash and toxic fluids spilled in the parking lots from cars, busses and service vehicles getting washed by rain into the creek. These toxic fluids include but are not limited to gasoline, oil, brake fluid and radiator fluid. Please pay attention to the inescapable blocking of passage of these creatures, and others not mentioned here, to Pruitt Creek for water and food.

Greenhouse gases- There will be significant greenhouse gas emission during this long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, buses, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Vehicles driving and parking on the property will leak fluids including but not limited to gasoline, oil, brake and transmission fluid into the parking and flow into the creeks and therefor the groundwater. The creeks and groundwater will also be polluted by trash floating in rain runoff and flying in the air from the wind blowing through the parking lot. The plastic that is component of this garbage will fill Pruitt Creek and leach into the groundwater. Please study the adverse effects from these sources of contamination to groundwater and the impact on individuals and agricultural users of well water who rely on pure water to maintain their organic certification.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please also investigate the dust storms which can contain silica from concrete that this project will create during construction. Silica (a component of sand) when inhaled can impair lung function. Please investigate what, if any, hazardous emissions/ dust/ abrasive particles/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale

and pricing. The Oak Park residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the local roads and HWY 101, potential depletion of groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact and costs this proposed project will have on existing infrastructure including increasing wear and tear on roads due to increased traffic. Please study the demand and costs passed on to local communities for law enforcement directly by the project and for the increase of law enforcement in the community as a whole. Please study the effect on the local populace of the pollution of air and aquifer depletion. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are two lane roads without the option for widening. There is residential housing and a church going west along Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what the impact on traffic on the existing roadways will be from the creation of any proposed ingress or egress locations at the proposed site. I, as a senior, moved out of a congested city to live in a less crowded setting to make it easier to shop and get to doctors offices.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study the impact of the casino project's electrical usage on the PG&E facility/facilities

providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. I, as a senior, will be negatively affected by more frequent power outages if this project creates too much demand on the grid.

Land resources Topography/Geology/Soils- The casino project will require extensive grading and disruption to the current water absorbing soils and flat topography that act as a flood plain. Please study what the impact will be to the local neighborhood, streets and roads, and environment due to site grading for parking buildings and other structures and development changing the topography. Could this project create a channelizing of Pruitt Creek south of East Shiloh Road and therefor a choke point to water flow that can cause flooding of East Shiloh Road at Pruitt Creek. Please also study what the impact will be to residents ability to evacuate in case of a flood on East Shiloh Road next to the proposed project. Will this project be graded so that water will flow off their parking lots and away from their building and structures and into Pruitt Creek? This volume of this runoff could cause Pruitt Creek to flood Shiloh Road.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact of this extreme modification of the land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, and people too. Please study what the impact of lighting at the proposed casino sight will have on native wildlife and people.

Local air pollution and public health - In addition to the greenhouse gases permanently emitted by this project, please study the effect on local air pollution in our neighborhood and the local public health impacts from increased vehicle traffic on neighborhood roads and highways. These health impacts are caused by toxic fumes and wind born particles emitted by and created by moving vehicles and idling vehicles used during construction including but not limited to construction equipment, delivery and construction worker vehicles. The review should consider all phases of the proposed project, including not only the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, but also from the delivery trucks and other commercial vehicles used during the project's daily operations, and the 24/7 pollution from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. This project replaces greenhouse gas absorbing grapes (which create clean air) with thousands of vehicles that burn fossil fuels that emit CO and other toxic pollutants in a gaseous state. Also vehicle movement creates wind born particles. This creates dirty irritating air which can make the insides of nearby houses filthy. It is inevitable that a project of this size will have a very large impact on air pollution in nearby homes. Please also recognize the fact that there will be a permanent decline in lung capacity in our neighborhood due to this increase in particulate matter, in particular the silica dust, from concrete used in construction. Also gaseous toxics, including NOx, and other foreseeable air-born pollutants will contribute to the pollution of our neighborhood on a permanent basis and create a general decline in our health.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also unanimously passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods 2) in areas specifically zoned for residential/ agricultural use only (not commercial use) where development is regulated for the benefit of all the residents of the County. 3) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 4) built in rural areas isolated from established residential communities. 5) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos) 6) built with a single purpose transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the large size of this gambling casino resort at this location will cast a large shadow upon the local landscape and local family life activities, overwhelm the resources of the public services, ruin the safe fun of Esposti Park and safe quiet of Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and from vehicles on the property and roads for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along Old Redwood Highway and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor and groundwater recharge source - Please study the impact on upstream and downstream Pruitt Creek and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat for plants and animals in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the effect of channelizing of Pruitt Creek and the effect of polluted rainwater runoff from the project parking areas. That runoff will be polluted by parking lot trash and toxic vehicle fluids (gasoline, oil, transmission and brake fluids to name some of the toxic fluids from vehicles) in the parking areas. The plastic in trash will break down and leach into Pruitt Creek. Small plastic particles and fluids will soak the soil of Pruitt Creek, killing vegetation and poisoning the aquifer. Please study the economic value of the water

used by local agriculture on and near this parcel, and the current vineyard's (on the project location) significance for recharging the aquifer, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills. The project will be visible directly from Old Redwood Highway next to the casino, along East Shiloh Road to Faught Road and along Faught Road, from Hwy 101 looking eastward, and along River Road in the Fulton area looking eastward. Also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These events come to this location because of its special open space “rural” quality and vineyards.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat for fish and amphibians and provides essential food (including grapes for turkeys), water(from the creek and the drip systems for the grapes) and habitat for other animals. Please study the long term impact of the casino project construction on the animal and plant life/habitat on the casino site. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park whose animals(turkeys) will lose access to property's grapes in the fall and Pruitt Creek. Please study the long term impact on the animal and plant life/habitat on the casino site of the casino project's day-to-day operation which includes having thousands of vehicles on the property which will generate lots of trash and also become inadvertent sources of toxic fluid wastes caused by these vehicles leaking fluids (gasoline, oil, brake and transmission fluid to name a few of the toxic fluids vehicles leak) onto the driveways and parking areas. Please study the long term impact of the casino project's long term day-to-day operation on the animal and plant life/habitat/aquifer in the area surrounding the casino project, including what will happen to the surrounding vineyards, Shiloh Regional Park and Pruitt Creek if the aquifer is lowered and polluted by the toxic fluids mentioned here or by other toxic fluids I have not named.

Mudflow evacuation- The National Weather Service Recently has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino

project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is repeatedly in a red flag warning for critical fire risk. Please study the potential for mud flow damage into Pruitt Creek and on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the homes, roads and businesses downstream of the complex by the project's diversion of storm runoff into Pruitt Creek.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and are a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection or lack thereof to Sonoma County.

Annoying/Disruptive/Sleep Disturbing Noises - From increased traffic and construction; noise from entertainment at a casino resort which will have special events,

indoor and outdoor live bands and music, loud speaker announcements, and building alarms. Noise night and day from firecrackers and fireworks, car sound systems, boom boxes, broken/absent mufflers on cars and motorcycles, motorcycle and car engines being revved, cars and motorcycles spinning wheels in the parking lot and on the roads right next to the residents who live along Old Redwood Highway, Shiloh and Faught Roads. Car alarms beeping when locking and unlocking and sounding off when activated or when they are defective. Beeping from service vehicles going in reverse. Noise from pet dogs in the neighborhood barking in response to the noise from the casino resort. Please consider the impact of this noise on the health of the people who live in the neighborhood of this project, their pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health. See paragraph on **Annoying/Disruptive/Sleep Disturbing Noises** for a partial list of noises.

Public Safety- Please study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the residents of the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light

commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods are located less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, lower property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response with traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During the emergency evacuations in 2017 and 2019 traffic on US 101 was brought to a crawl because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents and vineyards in the surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further reduction of water use is forthcoming. Because of ongoing and projected worsening

drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk- Please investigate the loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. The casino/resort is located at the edge of two recent devastating fires, the Tubbs Fire 2017 and the Kincade Fire in 2019 – please study the management of fighting wildfires and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters might have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season

games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oak, trees will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Thank you for considering my comments.

*Bonnie Farrow
5820 Mathilde Drive, Windsor, CA 95492*

From: melissa parmenter
Sent: Friday, June 17, 2022 2:37 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide my comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

As a homeowner at 217 East Shiloh Road, Santa Rosa, CA 95403 we will experience immediate environmental impacts. We live about 50 feet from the entrance of the proposed casino and resort project. Currently, we experience moderate traffic on East Shiloh Road and some noise pollution as a result. The addition of such a large-scale project will greatly impact our home and quality of life - to the point it will be impossible to remain in our home. We will be forced to sell our home and will likely not receive market value as we will have to disclose that a casino will be essentially at our front door. I have attached photos that I have taken from my front door and yard that show how close the casino would be to homes.

We bought our home with hopes of enjoying retirement on our acre in the country after dedicating our lives to public service. Those hopes were dashed when this proposal went public. While I realize the current review is for environmental purposes, the impact to the people living in this area should be of greatest concern.

East Shiloh Road is a small, two lane country road lined with oak trees, neighborhoods, small farms and vineyards. On the site of the proposed Casino and Resort project, there is a seasonal creek running through the property, established oak trees and habitat for local wildlife. I often look out my front window to a view of hawks teaching their young to fly and hunt over the vineyard at 222 East Shiloh Road. I have observed turkeys with their chicks on the property, as well as foxes, coyote and deer. While this property is close to the town of Windsor, it is a rural setting. I cannot fathom a large scale casino in this area. It would ruin the environment and the tranquility of life in this area. There are neighborhoods, a regional park, church, little league park, schools all within close vicinity to this proposed project.

I implore you to examine the area in person to see that this is not the right place to put a casino. While I do not believe the Koi Nation has the right to place land into trust in Sonoma County (they are from a neighboring county and not supported by Sonoma County tribes), another location would seem more appropriate (not in a neighborhood).

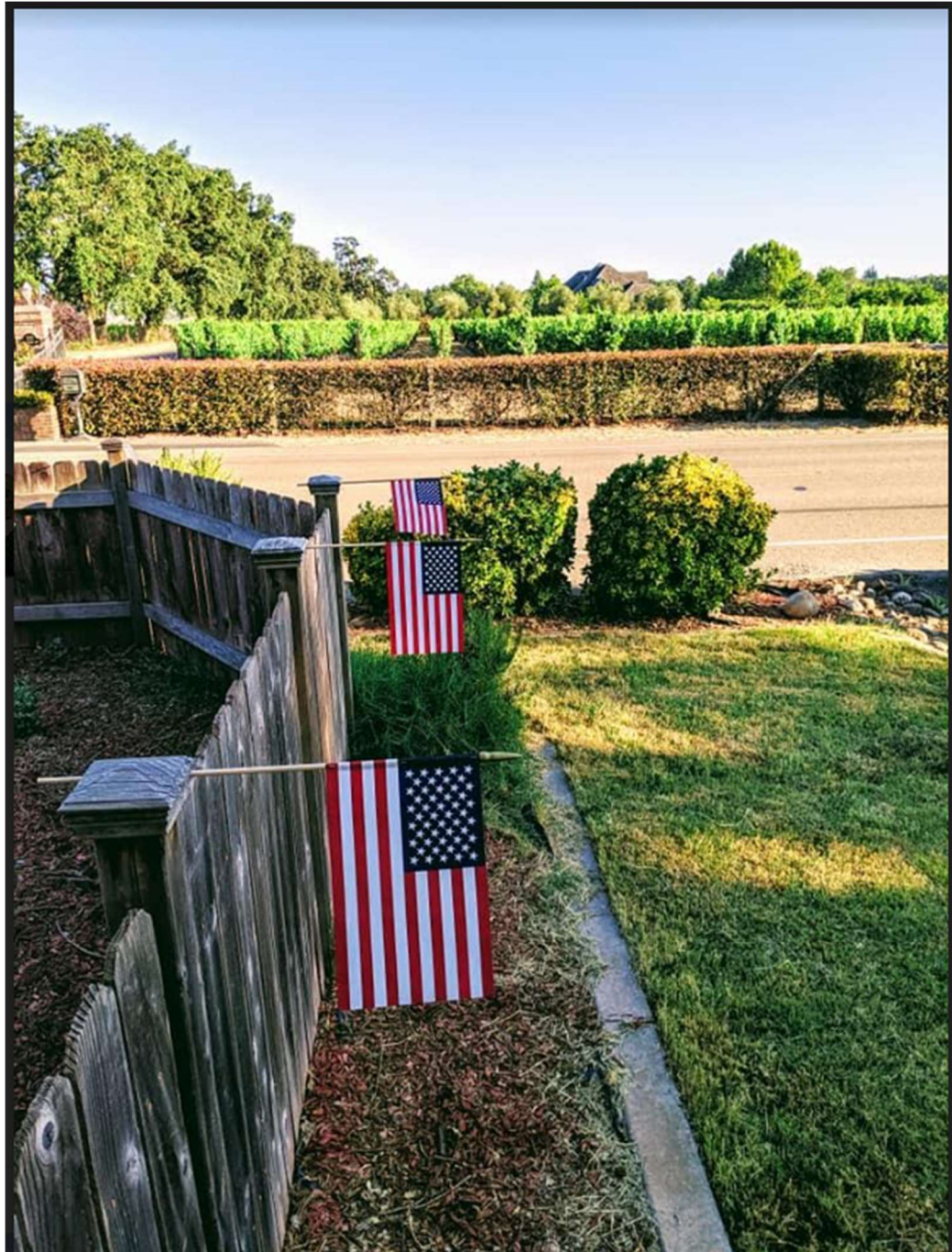
I could list unending reasons why this casino is not right for this location or for the citizens of Sonoma County (fire dangers, drought, destruction of land and habitat, increased crime, etc) I really hope you will look at the impact to the people who are living here now.

Thank you for your time.

Melissa Airolidi

217 East Shiloh Road
Santa Rosa, CA 95403









From: susan pulcheon
Sent: Friday, June 17, 2022 10:08 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento CA 95825

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comments period that opens on the Friday before a Federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

The entire project adversely affects this area in so many ways:

1. Deters profoundly from bucolic nature of Sonoma County
2. Adds to local air pollution and is harmful to local public health
3. Complete loss of aesthetic quality of neighborhood populations adjacent to the project
4. Decline in overall property values
5. Amplification of noise overall
6. Petrifying increase in carbon dioxide emissions
7. Terrifying close to schools
8. Increase in crimes (studies prove overwhelmingly increase in crime near casinos)
9. Close proximity to residential areas
10. Degradation of quality of life
11. Detrimental to community
12. Increase in drunk driving
13. Further stress to drought stricken area
14. Economic loss with devastation to local businesses
15. Fire danger increase
16. Groundwater contamination
17. Wildlife habitats destroyed

From: MEREDITH STROM

Sent: Friday, June 17, 2022 2:03 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I am adamantly opposed to the casino proposed on Shiloh Road in the Windsor area. I live one block off of Shiloh Road on Mathilde Drive, a quiet residential area of homes owned mostly by older citizens who have lived here for years. We will be across the road from this casino.

I have had to evacuate twice in the last two years due to wildfires I could see burning from my front door. Shiloh Road is the only access road between US 101 and several rural roads running along the hillside behind us. During these evacuations, Shiloh Road was backed up and stopped all the way to US 101 which is the only north/south through road in this part of the county. Emergency vehicles could not get through to the fires nor to assist people in need. I am 76 years old and need assistance when evacuating and my kids could not get to me to give that assistance. Imagine the increased risk and danger if traffic from employees and visitors to the casino are added to this situation.

With the exception of US101, almost all roads in this area are two-lane rural roads with heavy traffic. They are not well kept up and this increased traffic will only add to their failing condition. There are three elementary schools and several churches along with numerous mobile home parks within a mile or two of the proposed site. Traffic is gridlocked during drop off and pick up times for the schools. A casino, with its increased traffic, noise and possible crime will not be a good fit in this neighborhood.

The wine country, and Sonoma County specifically, is a destination for many bike races, triathlons, cycling club events and just pleasure riding. Nearby Shiloh Regional Park is home to mountain bike trails. Literally hundreds of these riders gather at Esposti Park, which is on the corner of Shiloh Road and the Old Redwood Highway, to begin their rides on a weekly basis. It is also a much used park for youth athletic teams and parking is at a premium, including on the shoulder of Shiloh Road all weekend and in the evenings, year around for soccer, youth football, baseball and other activities.

We bought our homes because this is a quiet area that backs up to open space and vineyards, believing the zoning would not allow anything to change that. What is to be almost certain 24 hour increase in traffic and other noise will completely disrupt our

lives, to say nothing of the decrease in our property values if we find we can not tolerate the traffic, noise, increased crime, light pollution, etc. and need to sell to relocate. I feel totally bullied and aggrieved that I might be expected to pay the price out of my retirement pension so that a casino can be built in an area not zoned for it and totally inappropriate for it.

Of further frustration for me is that the Koi Tribe that is pushing this casino has no legal or moral right to claim a connection to this land. This is evidenced by the fact that five other tribes in this immediate area have expressed their opposition to the project and will be negatively impacted by it.

Water is a constant concern for this area. This is the third year in a historic drought and produces increased fire risk. All Sonoma County residents are currently on mandatory water rationing. Adding this huge casino is going to negatively effect the water table as it draws massive amounts from the water table. This will effect not only those of us just across the road but for miles around.

We also experience periodic power outages. I can't image how much this tremendous power driven casino will add to that problem.

Thank you for considering my comments and your careful study of this proposed project.

Meredith Strom
5825 Mathilde Road
Windsor, CA 95492

From: Nancy Thomas
Sent: Friday, June 17, 2022 5:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California.

The noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

This Casino and resort should not be allowed and approved. We have enough casinos in Sonoma County.

Thank you for considering my comments.

Nancy Thomas

9108 Loch Haven Drive

From: Lonn Thomas
Sent: Friday, June 17, 2022 5:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Sonoma County already has many casinos and it doesn't need any more. This type of project does not belong in this area. Please reconsider this proposal.

Lonn Thomas

9108 Loch haven Drive

Santa Rosa, CA 95404

From: Rachel Mercedes Verdugo
Sent: Friday, June 17, 2022 1:49 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] CASINO PROJECT

"" THE COMMUNITY "" DOE'S NOT WANT THIS "", PLEASE CONSIDER, THE
AFFECTS: AIR, NOISE, CROWDING, TRAFFIC ETC.
THANK YOU.

Rachel Mercedes Verdugo

From: Richard Addison
Sent: Saturday, June 18, 2022 2:23 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To whom it may concern,

I'm writing to express my concern at the possibility that a gaming casino would be built on Shiloh Road, near Shiloh Ranch Regional Park, major bicycle routes, and close to residential areas. It is quite clear that this would be the wrong place for a casino due to traffic, congestion, noise pollution, and the difficulty of egress in case of another fire. Plus a casino would be a certain way to destroy such a beautiful, quiet, natural setting.

My hope would be that a different location can be found, somewhere far less problematic.

Thanks for hearing these concerns,

Richard B. Addison, PhD
862 Third Street
Santa Rosa, CA 95404

From: C Belden

Sent: Saturday, June 18, 2022 8:45 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino project scoping letter Part 1 - to be continued on next email

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA **extend the public comment period** and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

List of Statements/Issues

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino resort on the revenues and finances of the existing tribes' two casinos, and estimated impact on the revenues of the Cloverdale casino.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents.

Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Please study how this loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values **during construction** (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life, loss of aesthetic visual quality, and decline in public safety – wildfire evacuation, intoxicated driving, crime, noise, and decline in quality of residential life activities; a casino resort across the street from two major public parks with combining of transit routes to the

casino will have a big detrimental impact and make this area undesirable for families to raise their children or retire.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please consider the impact on the residents who need the new housing being built right now across the street - and the impact of loss of open space and of overcrowding of Esposti Park from visitors to the casino.

Please investigate the accuracy of the Koi description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes. Please study the accuracy of their statement about the Riparian corridor that now exists, crossing diagonally across the entire parcel from Shiloh Road to Old Redwood Highway, and how this will not be degraded, harmed, or cause loss of habitat for the existing wildlife during construction and for the next 50+ years by the operations of the casino resort.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning. Please study how the Shiloh Road location is different from Graton Rancheria and River Rock casino locations with respect to zoning regulations existing on those sites and compatibility of their commercial operations with the adjacent areas. Please contrast the location of the Shiloh casino resort proposal on the east side of Hwy 101, the residential side of Hwy 101, with the locations of Graton Rancheria on the west side of Hwy 101 in a commercial use zoning area, separated from the residential areas of Rohnert Park by Hwy 101, and the location of River Rock in a remote area far from any residential neighborhoods or other business areas.

Transit Routes and Traffic Increase -

Daily traffic on Old Redwood Highway at Shiloh Road is over 10,000 vehicles a day according to the Dept of Transportation Sonoma County (see transit map at end of this email). Please study the impact of a casino resort at this location and its impact on traffic for work, school, off-work rest and recreation and shopping at local stores for the residents in these areas and how the interconnection between Windsor, Larkfield and Santa Rosa will be impacted by increase of vehicle traffic 24 hr a day 7 days a week going to a casino resort at this location.

Please study the expected increase in vehicle traffic daily and during specific times of peak traffic that exists now, for morning and afternoon and evening commute to/ from work and school, for weekends when more tourist traffic is drawn to Shiloh Regional Park and Esposti Park, to the old car field on ORH, to the Shiloh Center for weekend shopping at Walmart and Home Depot and the other stores.

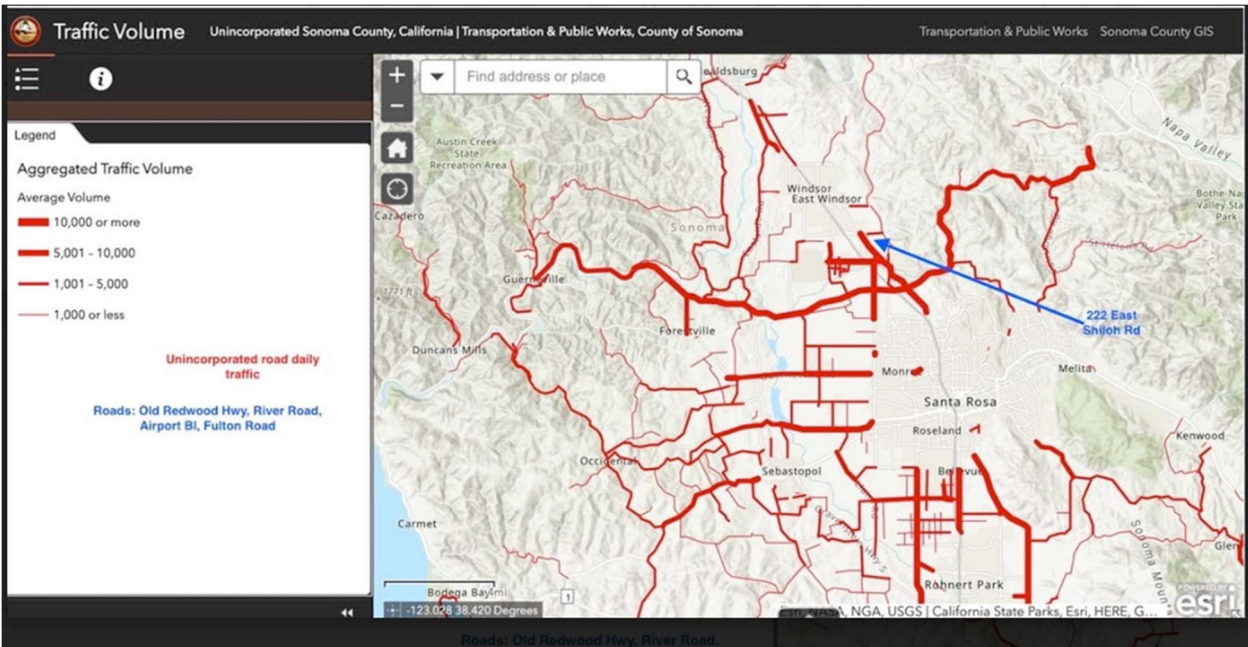
Please study the expected increase in vehicle traffic daily (24 hours) when a special event is scheduled for: Sonoma County outdoor events – IronMan, Gran Fondo, Century Ride, school track and field running events; and for special events planned by a casino resort to bring more visitors to the area.

Please study the impact of traffic to a casino resort on the businesses at Shiloh Center located at Shiloh and Hembree Lane. Please study the congestion and gridlock incidents on Hwy 101 near Shiloh Road and on Old Redwood Hwy/ Fulton Rd/ River Road/ Airport Blvd/ and Pleasant Ave. Please study the impact of casino traffic and tens of thousands of casino resort guests, employees, vendors, and service providers on the evacuation process in the event of the next wildfire in this area.

Please evaluate the risk to public health and safety when the next wildfire reaches this area. Consider the **impairment of emergency response vehicles**, fire engines, ambulances, highway patrol, sheriff deputies when there is traffic gridlock that extends for several miles on all the connecting routes to Shiloh Road. Consider the increased time to take someone in duress to a local hospital when the traffic is gridlocked.

Consider gridlocked evacuation routes when the next wildfire is raging towards Shiloh Road, as in 2017 and 2019.

This is PART ONE of several emails on this matter. CBelden 6/15/22



From: Diana Borges
Sent: Saturday, June 18, 2022 11:43 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing to provide comments to the Koi Nation's Notice of Preparation for an Environmental Assessment/Tribal EIR for a proposed Resort Casino at the corner of Old Redwood Highway and Shiloh Road. I am also requesting the 30-day public comment period be extended so that more individuals can be notified and have the opportunity to comment.

I only found out about the comment period when a friend emailed me on June 14th. Although publishing about the NOP/30-day comment period only in the Press Democrat satisfies NEPA requirements, the Press Democrat has many less readers than it once did. It is only this week that information about the NOP/comment period is being posted on social media platforms, such as Facebook and NextDoor. In addition, the comment period opened right before Memorial Day weekend, when many people were out of town. Considering the scale of this project and the lack of notification distribution, it seems appropriate to extend the comment period. I question whether these types of notifications published only in local newspapers is sufficient anymore.

The proposed Casino is anticipated to be at least as large as Graton Casino, which has about 10 million visitors per year. But Graton Casino is located in a commercial area, not in an urban/community-related area like the property in question. Below are my major comments and questions regarding the proposed development.

Proximity to Residential Neighborhoods, Churches, Parks and Schools

The proposed Resort Casino is too close to residential areas, churches, parks and schools and is not an appropriate location, especially for a 24/7, yearlong business of its scale. In the immediate vicinity, are at least two churches, several residential areas and two parks. At least two schools are within a one-mile radius. These areas are used by both adults and children. How will the development impact the quality of life on these areas, including the construction activities, increased vehicular traffic, light pollution, increased noise levels, potential crime, drunk drivers leaving the casino and likely decreased property values? There are many examples of how an area transforms from community-oriented/residential to commercial once a development like the Casino has been built.

Infrastructure Roads

Old Redwood Highway, Shiloh Road and Faught Road, which would be the access roads to the Casino are one-lane roads, without the option for widening. The highway overpass on Shiloh Road is also one-lane each direction. How can the roadways accommodate the number of construction vehicles, worker vehicles, delivery vehicles and visitor vehicles that are anticipated? It is my understanding that about 27,000 additional vehicles to this area daily are anticipated during operation. As it is now, the

intersection of Shiloh Road and Hembree Lane gets backed up at certain times during the day. These roads are also used for annual bike races, triathlons and other cycling purposes, which would be impacted by the increased traffic. During some of the events, traffic is stopped to allow the cyclists/runners to pass, which would cause gridlock due to the extra vehicles.

Three Casinos in Sonoma County

Construction of the Casino would be Sonoma County's third casino. Three large casinos in our area does not seem sustainable. If one of the three casinos closes, it will have major negative impacts to that area, ie vacant structures, loss of jobs and more.

Drought, Water Supply and Groundwater Recharge

We are in extreme drought years with no sign of relief. The drought and the continued construction of impermeable materials has caused our aquifers to be depleted. Operation of the Casino would require large amounts of groundwater extraction via onsite water-supply wells. The amount of groundwater extraction by the Casino would not be monitored or regulated thus no mechanism would exist to prevent increased drawdown of the aquifer(s) in the area. If sufficient drawdown occurs, it would necessitate some of the residents and churches in the area to have the pumps in their wells lowered or have new wells drilled, which is an expensive burden. Structures and parking lots would replace the existing vineyard, which now helps with groundwater recharge. In summary, the Casino would extract large amounts of groundwater and at the same time have decreased recharge areas, which is a two-fold impact to the aquifer. As a geologist, I can say there is no way to accurately predict how the Casino will impact the aquifer(s) because there are too many factors that cannot be accurately quantified.

Wildfire Risk

I am one of the leaders for COPE (Communities Organized to Prepare for Emergencies) and had to evacuate in 2019. We are in a high wildfire risk area. Vineyards are known to slow the spread of wildfires. Removal of the vineyard has the potential to increase the spread of wildfires, compared to existing conditions.

Emergency Response Time and Evacuations

I am extremely concerned about the impact the Casino will have on evacuation times, traffic flow and emergency response times for wildfires and earthquakes. During the 2019 Kincadee evacuation, where the entire Town of Windsor was required to evacuate, it took a friend who lived near Foothills Park 1.5 hours to reach Highway 101, less than 2 miles. I personally had to wait at the intersection of Old Redwood Highway and Shiloh Road for an uncomfortable amount of time during the evacuation. The increased number of anticipated vehicles will cause additional delays/gridlock for traffic flow during similar emergency situations. How will the increased traffic (projected 20,000 visitors a day plus employees, vendors, delivery drivers, etc.) impact evacuation routes, emergency response times and the safety of residents? What happens when vehicle traffic is increased due to the construction of additional neighborhoods, like the apartments being built at the northwest corner of Old Redwood Highway and Shiloh Road?

Impacts of Changing Zoning

Construction of a casino would require a zone change that would negatively impact the public, wildlife, vegetation and more. The Casino will include tall structures that will change the area aesthetics, especially for the people who already live nearby and those visiting Shiloh Park (less than 0.5 mile from site) and Esposti Park. The proposed Casino would be on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. The property serves as a riparian corridor, Valley Oak habitat, open space and greenbelt. Pruitt Creek bisects the central portion of the site.

Public Safety

Data supports the fact that crime (drug use, guns and violent crime) increases in areas that have casinos. Esposti Park is on the opposite side of Shiloh Road and less than 50 feet from the proposed site. Oak Park and Oak Creek subdivisions are located east and west of the park, respectively and low income housing is located across from the park, on the opposite side of Old Redwood Highway. The park is used by neighborhood families for recreation and sports leagues for children. Due to the location of the Casino, this park would probably attract drug users, prostitution and/or property crime. This would make the park unsafe to visit and for the families that live nearby. If this occurs, many of the residents in the area would move to a more desirable, safer location. We moved to this area for a specific lifestyle that would no longer exist.

No Significant Connection to the Land by the Koi Tribe

The Koi Tribe is a Clearlake County Native American Tribe. This is the third county outside of their historical land in Clearlake the Koi have tried to build a casino. As stated on Sonoma County's website for the NOP (https://sonomacounty.ca.gov/county-seeks-public-input-as-koi-tribe-prepares-environmental-assessment-for-casino-site?fbclid=IwAR15-v7r_593N6FMXekbvGNpZ-gXVob3owsMxOWXYxssKK5moeQmoGMe3nE) "All five federally recognized Sonoma County tribes and the County of Sonoma itself, have written letters in opposition or released resolutions in opposition to the Koi Nation's application to take lands into trust in Sonoma County, where they have no ancestral ties."

Thank you for considering my concerns and extension request. I live approximately one mile from the proposed site and know the Casino would negatively impact my life. I hope you conclude the proposed location is not appropriate for a Casino, the Koi Nation does not have ties to the land and act accordingly.

Diana Borges
179 Dartmouth Way
Windsor, CA

Richard N. Boyd
5846 Leona Court
Windsor, CA 95492
June 18, 2022

Ms. Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: Koi Nation Shiloh Resort and Casino Project

Dear Ms. Dutschke,

I am writing to express my concerns about the proposed Koi Nation Casino just adjacent to Windsor, CA. I am a homeowner two blocks from Shiloh Road, and was horrified when I first heard about the proposed project. My reasons are numerous and will be detailed below. For the record, I generally support the efforts of Indians to establish themselves; I am an honorary Native American (Santa Clara Pueblo), so my beliefs in that regard are well documented.

But let me provide more details.

How would the citizens of the Koi Nation benefit from this? This is one of my major concerns. Since the Koi are partnering with the (much larger) Chickasaw Nation, currently based in Oklahoma, and the casino as proposed would have thousands of employees, the Chickasaw Nation would clearly dominate the operation of the project. Given this situation it's difficult to see how the Koi Nation would profit more than incrementally from it.

How would the casino affect water resources and runoff? The proposal states that water for the casino would come from wells. But extracting huge amounts of water from the local aquifer will surely affect water levels everywhere. It is not difficult to imagine that the amount of water required to operate the proposed hotel and casino would cause many nearby wells to run dry. Please investigate this concern very carefully.

As for runoff, that's another major issue. Replacing a large fraction of what is now farmland, which soaks up much of the runoff in any rainfall, with buildings and asphalt will certainly have an impact on the water that will be dumped into Pruitt Creek, especially in case of a heavy rainfall. And extreme effects like that are the way of the future. I am concerned that Pruitt Creek would become a raging river if it needs to handle a greatly increased runoff load from a heavy rainfall.

How would the casino affect air quality? Even after construction was completed, the huge amount of traffic in the area from the thousands of vehicles anticipated on Old Redwood Highway and Shiloh Road

would undoubtedly have an extremely deleterious effect on the local air quality. Please study this possibility carefully.

Would the casino affect biological resources? The extent of these effects are not discernable from the proposal. It uses the phrase “To the extent feasible, the proposed project would avoid development within Pruitt Creek and associated riparian corridor.” If the proposal goes forward, that gives carte blanche to the operators of the casino when its needs and wants are in conflict with what is “feasible.” Please be sure this issue is better defined.

Would the project adversely affect Transportation and Circulation? Obviously yes. The huge increase in traffic on Shiloh Road and Old Redwood Highway would impact vehicular traffic, leading to congestion, tie-ups, and an increase in accidents (especially from somewhat inebriated customers of the casino). Users of Esposti Park: families, and children, especially little leaguers, will be at risk, as will people using Shiloh Park. Furthermore, the hundreds of new families who will inhabit the large new development at the northwest corner of Old Redwood Highway and Shiloh Road, together with the partisans of the casino, would inevitably cause a huge increase in traffic.

I believe the issue that merits your greatest attention is the effect of the huge number of people at the casino when the area needs to be evacuated due to fire danger. This has happened twice in the last four years, and with the changing climate, it can be expected to become even more frequent. Roads were already congested during those evacuations, and dumping ten thousand or more cars into the mix would be expected to produce an extremely dangerous situation.

How would the project affect land use? The proposal states that it would maintain existing vineyard areas around the site perimeter to reduce the potential for land use conflicts with adjacent residential and agricultural areas.” This clearly needs greater specification,. How many rows of grapes would be maintained? One? Ten? And how could that have a positive effect anyway on “land use conflicts with adjacent residential areas” with a behemoth of a casino lurking right behind? Please give this question your serious attention.

How would the Project affect the need for public services from Windsor? The claim is that no public services would be needed. What happens when its wells run dry? And can the Project really process its waste water? Will there be settling ponds? Where? There is little in the proposal to suggest that the source of water and the processing of wastewater has been thought through. Especially when there is a serious drought.

How would the project affect the noise and aesthetics in the area? This is also an important question. Gambling casinos, complete with restaurants, bars, and slot machines, are not quiet places. Add to that thousands of cars coming and going per day, and the noise level would be expected to increase by a huge factor.

As for aesthetics, it’s difficult to imagine anything having a more negative effect on what is currently a quiet residential neighborhood than an enormous twenty-four/seven gambling casino. Please give this

question your most serious attention; if the project were to go forward it certainly has the potential to destroy the neighborhoods of the entire south side of Windsor.

Alternate sites or plans. I do not see reducing the scope of the project, even by quite a bit, as a realistic alternative to the current plan. I fear that a huge casino, with a hotel, restaurants, and parking lots would still be a dangerous development, compromising safety and environmental quality for the entire area.

I appreciate the attention you will be giving to these and the many other issues associated with the Koi Nation Shiloh Resort Casino Project proposal.

Yours sincerely,

Richard N. Boyd, Ph.D.

From: Pam Bruszewski
Sent: Saturday, June 18, 2022 8:12 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region

I am writing to provide comments on the proposed Koi Nation Resort and Casino Project.

First of all, I respectfully request that more time be provided for public comment. Thirty days may meet the letter of the law, but it really does not give enough time, especially since the beginning of the comment period was a holiday weekend. Thank you for considering this.

I sympathize with the Koi Nation's desire to improve their quality of life. Native Americans have been poorly treated by this country for hundreds of years and deserve a better future. However, building a mega-casino complex in the middle of a sleepy, semi-rural residential neighborhood is a bad idea on many levels. I would like to see them find a more appropriate location for their casino or else find a different way of using the land they purchased. I hope that all agencies involved in the approval process seriously study the impact on the neighborhood. I am unaware of any other casino in California that is located this close to homes, schools, churches, playgrounds and parks.

My family and I have lived for 25 years in a house that backs up to Shiloh Road, half a block east of Old Redwood Highway. Currently, we hear the occasional car driving up or down Shiloh, and during rush hour there may be 8 or 10 cars driving through the intersection at a time. Our backyard is just a couple hundred feet away from one of the proposed entrances to the casino property. I shudder to think of the many thousands of vehicles we will be hearing night and day and the exhaust we will be breathing in.

We live in a high fire danger zone and were evacuated twice in the past few years. Everyone leaving at once led to a serious and dangerous backup situation, just to get to the 101 freeway, which is less than a mile away. What will happen when the number of people evacuated grows from a few hundred to tens of thousands?

The proposed casino says it will be self-sufficient in providing for its own water and treating its own wastewater. How will going deep into the ground to extract water impact the water table which supports the surrounding areas? As for the proposed wastewater plant, there is a good reason wastewater facilities are typically located in remote areas: they smell, overflow, have accidents, etc. It's the nature of the beast. This should be studied thoroughly as well.

I have always felt very safe in my neighborhood, even at night in adjacent Esposti park. In 25 years, the only crime I am aware of has been items occasionally stolen from unlocked vehicles. Because this park is literally across the street from the casino entrance, I can only imagine some of the estimated 57,000 daily visitors will wander over to the park, and some of those will be drunk or desperate for money. I will no longer feel so safe, even during the daytime.

The Koi claim they desire to be good neighbors, yet subjecting our neighborhood to noise, exhaust, light pollution, and increased crime is not the way to do this. Finding another use for the land or another location for the casino is the only way.

Thank you for considering my comments.

Pam Bruszewski
219 Lea St.

Windsor CA 95492

From: Eric Lucas

Sent: Saturday, June 18, 2022 11:02 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business. Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant. Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace

and quiet after working all day or for those who work night-time shift, peace and quiet during the day. Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino. Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

This casino should not be built here!

Regards,
Eric Lucas
516 Eureka Ave.
Santa Rosa, CA 95403

From: Harold
Sent: Saturday, June 18, 2022 9:54 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Harold Minkin <haroldminkin6@gmail.com>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr Broussard,

I am sure you are aware that we currently have several casino's nearby and myself and many others in the area believe your project is not in the best interest of the Windsor community! Issues that need to be addressed: Water issues, traffic congestion on a two lane road, the need for more police and fire department employees.

With Dry Creek Rancheria and Graton Resort both nearby, perhaps considering a different type of project instead of another casino which attracts crime, drunk drivers, etc. Why not consider a winery, restaurant, hotel and showroom!

Regards,

Harold Minkin
Resident, Windsor, CA

From: Katherine Schram
Sent: Saturday, June 18, 2022 4:55 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To Whom It May Concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I have many concerns about this project, but my primary two are:

Fire Evacuation Routes – Historically, this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Thank you for considering my comments

Katherine Schram

7335 Shiloh Ridge

Santa Rosa, CA 95403

From: Dinah and James Costello

Sent: Sunday, June 19, 2022 12:54 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: Dinah Costello <haviceprin@aol.com>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project (Sonoma County, CA)

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

Dear Mr. Broussard and Ms. Dutschke,

You will no doubt be receiving letters/emails from many in the Sonoma County, CA community opposing the Shiloh Casino Resort proposal of the Koi Nation of Lake (not Sonoma) County. The objections to this massive and uninvited intrusion into our neighborhood are numerous and, most importantly, well founded. They include the Koi Nations non-existent status in Sonoma County, the outside gaming interests using them as cover for another casino project, and countless environmental and public safety issues.

On a personal note: My wife and I, both teachers, moved to Windsor (Sonoma County) off Shiloh Road 20 years ago. We purchased our dream home -- surrounded by vineyards and 2 public parks (Shiloh Regional and Esposti) -- in a mostly agriculturally-zoned setting. We worked hard, paid our taxes, saved, and looked forward to spending our latter years here. We were shocked and dismayed to hear that a gigantic casino resort was being planned directly across the street from our home. Sonoma County presently has a casino 15 minutes to the south (Graton) and 15 minutes to the north (River Rock) of our home. Building another casino in the middle of our neighborhood, destroying a beautiful vineyard and severely affecting the quality of life of our community, should have been stopped before it reached this stage. Please visit this beautiful area of Sonoma County. Drive down our block and imagine the damage this project will do to our neighbors and surrounding small businesses, schools, and churches. This whole project has caused unnecessary stress and anxiety in the good people we call our friends. Please join us and stop this ill-conceived and dangerous proposal from becoming reality.

Respectfully yours,

James Costello

5840 Mathilde Drive

Windsor, Ca 95492

From: Nina Cote
Sent: Sunday, June 19, 2022 9:43 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Nina Cote <nina.cote@sbcglobal.net>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I've been a resident of Oak Park, which is directly across the street from the proposed casino, for over 20 years. I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that

a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area - in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety - wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/ Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Thank you for considering my comments.

Nina Cote'
5828 Mathilde Drive, Windsor CA 95492

From: Marie Fanelli

Sent: Sunday, June 19, 2022 6:30 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project“

Thank you in advance for considering my family's negative opinion of the potential for ANY commercial development at the Shilo intersection. Our community struggles now balancing infrastructure needs and the residential development that's required in our available spaces open to develop. My family and I reside on the East side of Windsor along Hembree Lane. We lived through our existing neighborhoods needing to be evacuated and I find it unconscionable to consider that our community be asked to allow a development that would create a perfect bottleneck disaster. The new dense residential projects planned and currently being built will tax already strained surface roads. We undertake these projects considering the community's housing NEEDS during a housing crisis. I'm sure somebody there in the emergency services department could calculate of the duration of the vehicle back-up along ORH and Hembree Lane during the last evacuation. That was a planned, orderly evacuation that took hours. An emergency evacuation of this area would not be possible with the intended development of the casino and its adjacent supporting businesses intended by the tribe that we DO NOT NEED. Additionally, we are just now getting our act together to hopefully survive as the drought gets worse and less water is available. Please, do the right thing and prevent this from happening. It is the wrong project at the wrong time for that location.

Sincerely,
Marie Fanelli
611 Yerba Buena Way
Windsor CA

From: Sue Frey

Sent: Sunday, June 19, 2022 4:05 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project - Recommendation to Reject Project

My name and address are:

Sue Frey

340 Donna Drive

Windsor, CA 95492

I am extremely concerned about the Koi Nation casino that is being proposed on the corner of Old Redwood Hwy and Shiloh Road. I request that you reject their request to build their casino at this location.

For the last 37 years My husband and I have lived less than a mile from the corner of Shiloh and Old Redwood Hwy. We purchased our home in this area because it is a very nice, quiet community with good schools, a low crime rate, and great access to lovely regional parks.

If an Indian casino is approved at this location, our environment will be dramatically changed for the worse. We would experience excessive traffic congestion, noise, and increased crime rates.

I don't understand why this location is even being considered. Following are some of my concerns.

- The Koi Nation has no connection to Windsor, CA. In my opinion they should either build a casino on their historic lands, or find a community that is in favor of building an Indian casino.
- The north side of the proposed casino location is directly across the street from a residential area. Why would this even be considered? Casinos should never be built in the same neighborhood as single-family homes.
- The east side of the proposed casino location is directly across the street from the entrance to Shiloh regional park. I consider Shiloh the best of the Sonoma County regional parks, and I would no longer feel safe hiking in the park if a casino was built directly across the street from the park entrance. I suspect many other hikers would feel the same way.
- The current roads are insufficient for handling the excess traffic. This location was previously a home with 60+ acres of grapes.
- There are already two casinos within 15 miles of this location, Graton Resort in Rohnert Park, and River Rock in Geyserville. There is absolutely no need for an additional casino.
- The homes in the area would each drop in value by hundreds of thousands of dollars. This devaluation would come at a time when inflation is rampant and people are losing their retirements in a declining stock and bond market. The homeowners cannot afford to take another financial hit on their one asset that has not plummeted in value.
- It was clear from the beginning that everyone in the area would be negatively affected by the addition of a casino. The Koi tribe knew this when they purchased the property. That's why they hid their identity from the seller and the surrounding community.

I do not appreciate the deception used to negatively impact the community we have called home for decades just to allow the Koi Nation to turn a profit from gambling,

I respectfully request that you reject the application for the Koi Nation Shiloh Resort and Casino Project.

Thank you,

Sue Frey

TO:

Chad Broussard @ BIA
Tribal Affairs, Sonoma County
Sn McGuire
City of Windsor Town Council

From: Bob and Nancy Jenkins
June 19, 2022

We were shocked and appalled at the prospect of a third casino in our county. We strongly oppose development of the proposed Koi Casino on East Shiloh Avenue in Santa Rosa, California for the following reasons:

The Sonoma County Board of Supervisors voted unanimously to oppose the proposed casino. The Board said in a statement that the Koi are a "non-Sonoma County tribe." The board said it came to the decision based on letters of **opposition from five other Sonoma County tribes: The Kashia Band of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Cloverdale Rancheria of Pomo Indians, Federated Indians of Graton Rancheria and Lytton Band of Pomo Indians.** All five federally recognized Sonoma County tribes and the County of Sonoma itself, have written letters in opposition to the Koi Nation's application to take lands into trust in Sonoma County, where they have no ancestral ties.

Sonoma County doesn't need another casino. The planned **casino** would sit only about 18 miles from the River Rock Casino and a mere 13 miles from the Graton Resort and Casino.

The casino will bring **traffic, pollution, crime and lowered property values** to a substantial area of northeast Sonoma County.

The surrounding neighborhoods have been evacuated multiple times each of the past four years. Those evacuations have resulted in total gridlock scenarios due to dense surrounding residential neighborhoods on East Shiloh Road and limited escape routes in the immediate area. Adding the casino users— hotel, spa, 6 restaurants and 2000 employees— would create a **death trap in a wildfire.**

This project will result in huge **water and sewer impacts.** The infrastructure which was not designed for this kind of Use. The area was designed to support residential and agricultural use, and that is how it is currently zoned.

We hope that you will deny this project and/or reconsider its location.

Sincerely,

Bob and Nancy Jenkins
Sebastopol, CA

From: TERESA LOPEZ

Sent: Sunday, June 19, 2022 10:48 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

- To Whom It May Concern:

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 30+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, our streets and freeways will be most seriously impacted - again NOT in a positive manner, including more crime, increased public safety expenses, etc. When we all evacuated three years ago, the roads were clogged and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose the building of this casino.

Thank you,

Mary Lopez

Santa Rosa 95403

From: Ron and Carrie Myers

Sent: Sunday, June 19, 2022 6:39 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] "Koi Nation Shiloh Resort and Casino Project"

Dear Chad,

I am writing to express my vehement opposition to the proposed casino on Shilo Road.

As a homeowner near this property, I have many many concerns regarding a casino on this site.

Over the past 5 years, we have had to evacuate this area 3 times (2 mandatory and one voluntary) due to fire danger.

It absolutely does not make sense to add a large casino and hotel in this location for the public fire safety issue alone.

Another critical issue is the lack of water. Currently we are in water saving measures. This means only being allowed to water on designated days and for limited times.

We are also using buckets to capture water while waiting for the shower to heat up. We then use that water to water the plants. Our multi year drought conditions can not support this proposed project!!

In addition, it is not in good conscience to build a gambling facility right across the street from a residential area, church, park and near an elementary school.

Please take the above concerns into consideration and let's stop the progress of this casino.

Thank You,

Ron & Carrie Myers

From: James and Linda Selby
Sent: Sunday, June 19, 2022 6:17 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

We are writing to express our deep concern regarding the proposed **Koi Nation Shiloh Resort and Casino Project**. This project is a terrible idea, on so many levels.

We have lived in Windsor for 42 years. We've watched it grow from a farm working community to a vibrant family-centered town. We have seen our share of 'growing pains' but this Casino would forever change the quality of life here in a way that would benefit no one except the project stakeholders. Following are some of our concerns: Shiloh Rd is an extremely busy road.

Taking the Shiloh Rd exit traveling **west** from Hwy 101 to Windsor Rd: This is the road that folks take to get to WorldMark Resort, The Windsor Golf Course and Restaurant, the Santa Rosa Memorial Park Cemetery, Windsor High School, Cali Calmecac Language Academy, and two large subdivisions (Ventana and the Vintage Greens subdivisions). In addition, there is a large senior-living complex proposed at the corner of Shiloh Rd. and Hembree Ln. The proposal includes shops, restaurants and office buildings.

Taking the Shiloh Rd exit traveling **east** from Hwy 101: This is the road that leads to the large Shiloh Shopping Center, our beautiful Shiloh Ranch Regional Park and, very soon, will lead to a large housing complex on the NW corner of Shiloh and Old Redwood Hwy.

On Old Redwood Hwy, just a short distance **south** from Shiloh Rd., there are at least 3 churches. A short distance **north** is our local Esposti Park where families meet for picnics and sports games. It is a well-used and much-loved park. Less than a mile up the road is a senior retirement community.

Traffic going either direction is already a challenge at certain times of the day. Our roads are barely adequate. Please just imagine what impact the Resort and Casino will have on traffic flow in our community.

We are in a drought situation, with everyone working hard to comply with the Mandatory Water Rationing. We are also on hyper-alert for wildfires. Adding this proposed Resort and Casino increases the risk in both of these areas. Emergency Response times would most certainly be impacted.

We are in the midst of one of the most serious housing and homelessness crises this county and this town has faced. The massive amount of personnel it will take to operate this proposed casino will further exacerbate the situation. These employees will need to live *somewhere*. Low supply and high demand has already pushed housing costs past what most working people can afford, whether they are buying or renting.

Please understand, while we do not go to casinos, we are not opposed to them. We are just deeply, fearfully, fervently opposed to ANY project of the size and scope of the proposed Shiloh Resort and Casino in this location, a project that would daily bring thousands of people to our community. Our infrastructure simply can't handle it.

Thank you for the opportunity to voice our concerns.

Sincerely,

James and Linda Selby

399 Jensen Lane

Windsor CA 95492

From: Rachel Mercedes Verdugo
Sent: Sunday, June 19, 2022 12:27 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] CASINO

""NOT WANTED, CASINO. THANK YOU.

Rachel Mercedes Verdugo

Koi Nation Shiloh Resort and Casino Project

Chad.broussars@bia.gov

I have been a resident of Sonoma County since 1986 and I am proud and happy that I made the decision to relocate here. I live in the Larkfield Wikiup area, and it has been a great area for my family of three children to grow up and move on with their lives.

I moved to this area from Las Vegas after a commitment of 5 years with my employer. I saw cases of how bad the casino's had on my employees and families who lost all of their money in one night and ruined their families.

Casino's do bring jobs and revenue to an area but to build such a large project in the area of Shiloh Road is not acceptable to me or the residents of my neighborhood. There is a great local park across the street from this project that provides sports activities of the local community, and this would be a disruption to their safety and of the quietness and the safety of traffic on Shiloh and Old Redwood Highway.

The casino would bring a large flow of traffic, bringing with it the pollution of the cars and the noise and the draining of our water resources in our area.

We have experienced two major fire evacuations in this area and with few roads to get out of the area quickly. There was traffic backed up for miles with families trying to escape the raging fire that destroyed almost 6,000 homes and destroying the years of memories with families that can never be replaced.

With the effects of climate change and the sever drought that we are experiencing, the water table is being lowered to families in our area, Wells are drying up and water has to be trucked to properties for the survival of common drinking water and sanitation. This project would future drain the

valuable and limited water supply. There is no local water distribution to the area so wells would have to be drilled to support this project. The fire requirements per NFPA 1142 could exceed 500,000 to over a million gallons of water storage for fire and domestic use. The buildings should be required to have fire sprinkler and the property with fire hydrants. Diesel fire pump would be required to provide the necessary pressure and gallons of fire protection. Per NFPA 25, a diesel fire pump is required to be exercised, run, 30 minutes weekly. This will add to the noise and air pollution in our area.

Just the daily water requirement of a casino, hotel / resort with pools, rooms, restaurants, beverages, ice, sanitation, ect would be a tremendous drain on our already limited water supply. The wastewater would require a new wastewater treatment plant on site and that would add noise, consume energy, and emit.

This project would be a huge disruption to our very rural and beautiful area.

This new casino / resort will cause a drop property values to our great Larkfield Wikiup area and the surrounding area. Who would want to live by a noisy, high traffic, crime attracting, business like the casino? The lights alone at night will disrupt our beautiful night sky for seeing the stars.

There are open areas away from the populated public to build such a project, so why destroy our beautiful area? This would be a constant, 24 hour disruption to a beautiful, calm, limited access, limited water, area. This is not the intended use of this land for our area.

There has been no one in our area that I have discussed this with that approve of such a project to be constructed. This is the wrong area for such a large and the type of project and would be a disruption to the environment. Please do not allow this project to go forward.

Respectfully,

Tim Madura

411 Firelight Drive

Santa Rosa, California 95403

707-815-6983

From: amy rdh

Sent: Monday, June 20, 2022 3:52 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project – Recommendation to Reject Project

My name and address are:

Amy Banfill

183 Barrio Way

Windsor, CA 95492

I am extremely concerned about the Koi Nation casino that is being proposed on the corner of Old Redwood Hwy and Shiloh Road. I request that you reject their request to build their casino at this location.

For the the last 37 years my parents have lived less than a mile from the corner of Shiloh and Old Redwood Hwy, where I was raised. In 2021, my husband and I purchased our home just down the road from my parents and subsequently, the potential casino site. We purchased our home in this area because it is a very nice, quiet community with good schools, a low crime rate, and great access to lovely regional parks.

If an Indian casino is approved at this location, our environment will be dramatically changed for the worse. We would experience excessive traffic congestion, noise, and increased crime rates.

I don't understand why this location is even being considered. Following are some of my concerns.

The Koi Nation has no connection to Windsor, CA. In my opinion they should either build a casino on their historic lands, or find a community that is in favor of building an Indian casino.

The north side of the proposed casino location is directly across the street from a residential area. Why would this even be considered? Casinos should never be built in the same neighborhood as single-family homes.

The east side of the proposed casino location is directly across the street from the entrance to Shiloh regional park. I consider Shiloh the best of the Sonoma County regional parks, and I would no longer feel safe hiking in the park if a casino was built directly across the street from the park entrance. I suspect many other hikers would feel the same way.

The current roads are insufficient for handling the excess traffic. This location was previously a home with 60+ acres of vineyards.

There are already two casinos within 15 miles of this location, Graton Resort in Rohnert Park, and River Rock in Geyserville. There is absolutely no need for an additional casino.

The homes in the area would each drop in value by hundreds of thousands of dollars. This devaluation would come at a time when inflation is rampant and people are losing their retirements in a declining stock and bond market. The homeowners cannot afford to take another financial hit on their one asset that has not plummeted in value. It was clear from the beginning that everyone in the area would be negatively affected by the addition of a casino. The Koi tribe knew this when they purchased the property. That's why they hid their identity from the seller and the surrounding community. I do not appreciate the deception used to negatively impact the community we have called home for decades just to allow the Koi Nation to turn a profit from gambling,

I respectfully request that you reject the application for the Koi Nation Shiloh Resort and Casino Project.

Thank you,

Amy Banfill

From: John Bocci <jbocci@sonic.net>
Sent: Monday, June 20, 2022 1:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

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Sent from my iPhone

Begin forwarded message:

From: TribalAffairs <TribalAffairs@sonoma-county.org>
Date: June 20, 2022 at 12:59:26 PM PDT
To: John Bocci <jbocci@sonic.net>
Subject: Automatic reply: Casino

Thank you for your input on the Koi Notice of Preparation. Your input will be reviewed and included with the County's comments to the Bureau of Indian Affairs on June 27, 2022.

Please note that the Bureau of Indian Affairs is the decisionmaker on the Koi Nations request to have land taken into trust for gaming. In addition to sharing your comments with the County, you are encouraged to submit your comments directly to the Bureau of Indian Affairs, Department of the Interior. Per the Notice of Preparation, comments should be labeled "**Koi Nation Shiloh Resort and Casino Project**" and directed to chad.broussard@bia.gov.

DATES: Written comments on the scope of the EA should be sent to the Bureau of Indian Affairs as soon as possible and no later than Monday, June 27, 2022 (30 days after publication of this notice in *The Press Democrat*). (An additional comment period for the draft EA will be announced at a later date through the publication of a Notice of Availability.)

ADDRESSES: You may mail or hand-deliver written comments to Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way, Sacramento, CA 95825. Please include your name, return address, and "Koi Nation Shiloh Resort and Casino Project" on the first page of your written comments. You may also submit comments through email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Koi Nation Shiloh Resort and Casino Project" as the subject of your email.

From: Ron Calloway
Sent: Monday, June 20, 2022 7:48 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I must share my steadfast disapproval of the Koi Nation Shiloh Casino and Resort Project on Shiloh Road as a resident of the Larkfield area, who lives on [531 Coachlight Place](#), and as the Superintendent of the Mark West School District. As Superintendent, I had to personally address the Tubbs Fire at its onslaught. I made decisions on a daily basis to ensure the safety of our children in the Larkfield area. If we were to add the casino to this traumatic event, I shudder to think what the consequences might have been with the infrastructure that is still in place today.

This week I met with the California Department of Education at their request, as an expert, regarding the next disaster as it is already assumed that one is coming. During the course of our conversation we discussed all the mitigating factors: roads, water, air quality, and many others that need to be addressed currently to prepare for the next disaster. The area that has been designated for the Koi Nation Shiloh Casino Project is not prepared, nor will it ever be, to address this future disaster.

Furthermore, I do not understand placing a casino near San Miguel Elementary School. Would any public figure who has children attending a school advocate for the construction of a casino adjacent to their school? Of course not! This is not a "Nimby" statement, as across Highway 101 there is plenty of area to develop a casino near the airport, and which would not impact the access to 101, nor impact the educational lives of children.

Respectfully,

Ronald M. Calloway
Superintendent of Mark West School District
Larkfield Resident

--

Ron Calloway
Superintendent
Mark West Union School District
305 Mark West Springs Road
Santa Rosa, CA 95404
(707) 524-2970 phone
(707) 524-2976 fax

From: Peg Champion
Sent: Monday, June 20, 2022 4:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to you to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

To begin, I would ask that the BIA **extend the public comment period** and take additional steps to allow the public to participate more fully in the NEPA review process. Providing just 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review.

This proposal will significantly affect the quality of our environment, and should undergo **a full EIS analysis** with enough time for the public to participate at every stage of the process.

Next, **the Koi Tribe has been and is a Clearlake County Native American Tribe**. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County, and this is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County, as they are not from this area.

The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this proposed casino project will have financially on local indigenous tribes and the impact of the proposed casino site on the finances of the individual tribe members.

Finally, I ask that you **study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale**. All are located along the Hwy 101 corridor, **but** in areas compliant with commercial zoning and isolated, rural zoning.

Please **review the location of the other 47 casinos in Northern California** to identify any casino resorts that, like the proposed Koi casino, are:

- 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and **not** commercial use, where development is regulated for the benefit of all the residents of the County, as it is here in Windsor.
- 2) built a mere 15 miles from the closest casino, with 3 casinos within 30 mile distance along a major highway (ie. 15 minute driving between casinos) as this casino would be.

I believe you will find that, unlike this proposal, the other Northern California casinos are:

- 1) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel.
- 2) built in rural areas isolated from established residential communities.
- 3) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic.

Please study **the cumulative impact of these concerns** now, during construction, and for the following 50 years. This is relevant because the size of a gambling casino resort at this location will dominate the landscape and residential life, overwhelm the resources of the public services and neighborhood parks, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Thank you for your careful consideration of our community's concerns,

Peg Champion
1337 Woody Creek Lane
Windsor, CA 95492

From: DINAH COSTELLO
Sent: Monday, June 20, 2022 7:42 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Resort

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Thank you for considering my comments.

Dinah Costello
5840 Mathilde Drive
Windsor, CA 95492

From: Barbara Cottrell
Sent: Monday, June 20, 2022 4:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino Proposal

Dear Mr. Brossard, ATTN: Amy Dutschke

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Here are some of the ways I feel the Koi Casin will adversely effect the community.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Danger and loss of vineyards/ loss of green belt space

Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site.

Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles ? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one

lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/wildfire risk outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. Please study if these power outages will adversely impact the established residences/schools and small businesses with the addition of a casino resort at this location.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify

No significant connection to the land by Koi - The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Thank you for considering my comments.

Barbara Cottrell

From: Cecilia Domenichelli
Sent: Monday, June 20, 2022 5:02 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Enough is enough, Sonoma County already has plenty of casinos. The aesthetic appearance of another casino is an eye sore. What happened to living in the beautiful county with vineyards? It will cause noise pollution to all the neighborhoods surrounding the casino. This casino will cause property values to decrease. Neighborhood schools will be affected. It is no lie that this place will increase the crime rate, drunk drivers, sex trafficking, prostitution, etc. Old Redwood Highway cannot handle the amount of traffic this casino is going to create. We will also be increasing carbon dioxide emissions. When my family was trying to evacuate for the Tubbs fire, Old Redwood Hwy was jammed packed bumper to bumper with cars; this casino is a concern for fire evacuation routes. Please, please this casino is not needed. Please keep Sonoma County beautiful.

Thank you for considering my comments.

*Sincerely,
Cecilia Domenichelli*

From: Josephine Hamilton
Sent: Monday, June 20, 2022 10:01 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort & Casino Project

While I support the Koi Nation's right to establish such a casino, i strongly oppose the proposed location at Old Redwood Hwy (ORH) & Shiloh Rd.

Sonoma County already has 2 such casino's along the 101 corridor. What impact would this have on the existing establishments? What impact on public resources (police, roads, hospitals).

This location is adjacent to residential a neighborhood, park, church, and a large apartment building under construction on the NW corner of Shiloh & ORH.

Wildfire risk is real. Evacuation routes would be greatly impacted with additional traffic in an emergency.

This land use is not consistent with County Zoning.

Water is another impact. True the existing vineyard uses water, but that water goes right back into the ground. Large buildings with large parking lots block water use recharging the ground.

This project would increase greenhouse gases when the goal is to lower them.

Surely the Koi Nation can find a more suitable location closer to their lake county ancestral lands which could provide a much needed economic boost to that region.

Respectfully,

Josephine Hamilton
9447 Victoria Lane
Windsor, CA 95492

From: Camilla and Daniel Heidenreich

Sent: Monday, June 20, 2022 1:42 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino project

Dear Chad,

We are residents of Shiloh Road and we strongly oppose the building of this casino. Our gravest concerns are the wildfire risk and lack of proper road infrastructure. This area cannot sustain such a development and poses serious public safety risks (for the surrounding communities and potential employees of the casino). The roads will not be able to accommodate evacuations in the event of a wildfire and also the emergency rescue crews to get through (slowing the response time tremendously with imminent deaths as a result).

Please consider these serious issues and how they will impact the community. Thank you kindly.

Sincerely,
Camilla and Daniel Heidenreich

From: Heidi Jacquin
Sent: Monday, June 20, 2022 3:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino

Subject: Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process.

Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

It is my sincere belief that the casino will do grave harm to the area of Santa Rosa and Windsor for many reasons....not limited to environmental concerns.

Water Usage Impacts

Wildlife Impacts

Residential Quality of Life/Peace Impacts

Traffic Impacts

Wildfire Safety Impacts

Crime Impacts

Population Density Impacts

Thank you for considering my comments.

Sincerely,

Heidi Jacquin

From: Mark Kimmel
Sent: Monday, June 20, 2022 4:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino

Hi Chad,

The proposed Koi Casino is a bad idea in many ways. I am sure that you have received many e-mails about this. My wife and I moved to Shiloh estates from Lafayette CA which was once a bucolic and enjoyable place to live. It has become overcrowded and unpleasant. As Joni Mitchell wrote "take paradise and put up a parking lot". There will be numerous unintended consequences including traffic congestion, water shortages, safety problems, crime etc.

I hope you seriously consider the downside of the proposed casino and realize that this is not in the interests of the vast majority of people in Sonoma County.

Mark Kimmel
740 Shiloh Terrace
Santa Rosa CA, 95403

From: Jennifer Lopez
Sent: Monday, June 20, 2022 10:21 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Bureau of Indian Affairs, Department of the Interior

Attn: Mr. Broussard

We strongly oppose the KOI casino project.

My husband, myself and our 8 year old daughter live within 3 minutes of the proposed KOI casino site. We have built our life and chosen to raise our family in Windsor. We've encouraged our parents and other family members to relocate to our small, safe and family friendly community.

The increased traffic in our neighborhood in addition to the tens of thousands of visitors (many with bad intentions) SO close to our home, are our main family concerns.

Additional MAJOR concerns for our community: lack of infrastructure, ecological impact, drought, fire evacuations, public safety, noise and proximity to school, churches and neighborhoods.

Jennifer and Jaime Lopez
Windsor, CA

--

Jennifer

From: Lance Cottrell

Sent: Monday, June 20, 2022 4:42 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards/ loss of green belt space

Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the

Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods.

Fire Season is year-round and increasing – Please study the number of days of unhealthy air quality (NOAA) from 2017 to the present due to wildfire smoke in Sonoma County. Please study the number of days annually when the public is advised to stay indoors and/or is cautioned about working or exercising outdoors due to wildfire smoke. Please study how smoke and poor air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the decrease in visitors to the “Hwy 101 corridor of casinos” will be on a 4th casino resort’s revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf Please study the risk to customers on this site from dam failure due to earthquake, flood or other triggering events.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol-related traffic fatalities. Please investigate the impact of increased drunk/intoxicated drivers in a residential family neighborhood/community; please study the incidence of DUI during daytime hours and evening to morning hours; please evaluate the number of residents at risk who work normal daytime hours, evening and night shift hours; please evaluate the number of school children going to/ returning from the nearby schools; please study the number of nearby schools that have events at Esposti Park and

Shiloh Regional Park and the risk to their public safety and health with a casino resort across the street.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built-in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only, and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built-in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly. Traffic noise from Hwy 101 can be heard over 5 miles away at the top of Shiloh Regional Park and the Mayacama foothills.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Please study the additional volume of casino visitors'/employee cars, service trucks and traffic on Shiloh Road will harm public safety while biking, walking, running, and exercising on Shiloh Road. Please study the safety of bike riders during tours, races and recreational cycling with this added traffic volume.

Crime – Despite denials from the casino communities, data support the fact that crime increases in areas with casinos. Gambling addiction, and the need for a revenue stream to feed this, increases theft. 24 hour bar activity, both alcohol and cannabis, will increase incidents of intoxicated driving; gambling casinos also attract drug dealers, gangs, and prostitution. Please study the incidence of crime around large casinos and the impact on the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood

families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles ? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways

will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/wildfire risk outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. Please study if these power outages will adversely impact the established residences/schools and small businesses with the addition of a casino resort at this location.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

No significant connection to the land by Koi - The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Thank you for considering my comments.

Lance M. Cottrell

From: Paige Mazzoni

Sent: Monday, June 20, 2022 3:30 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: Paige Mazzoni <paigemazzoni@gmail.com>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing to voice our strong opposition to the proposed casino off of Shiloh Road. As you are no doubt aware, the Koi Tribe from Lake County has recently purchased vineyard acreage adjacent to a series of single-family residential neighborhoods, located at the crossroads of Old Redwood Highway and East Shiloh in North Santa Rosa/Windsor. They have announced plans to build a large casino complex, including multiple restaurants and a 200-room hotel. Our neighborhood, and all neighborhoods in the surrounding area, are very distressed by this plan and ask for your support in stopping this development. While we understand the need to address the wrongs committed against indigenous people in our country, we are confident that this proposed development is not an appropriate manifestation of those efforts. There are several reasons for our lack of support:

- It is well documented that the Koi tribe comes from Lake County. That is their tribal heritage and land. They did have a trade route through Sonoma County. All history and knowledge of this trade route shows that the path followed the Russian River and did not pass through the Windsor area. That was not the direct path followed. There should be no claim to this land as tribal land for a tribe from Lake County, either inherently or via a trade route. Rather, the land is prime real estate that is attractive. That does not justify tribal trust land jurisdiction.

- The neighborhoods adjacent to this proposed casino are middle class, mostly long-time resident neighborhoods. We are families, retired couples and citizens that have invested in our properties for a lifetime, planning to retire in the area because it is quiet, safe and family oriented. To introduce a casino in the midst of these neighborhoods would immediately and irreparably damage both the quality of the residents' lives as well as their lifetime investments.

- It is well established that casinos cause an increase in prostitution, drunk driving and crime in the immediate area. In the Thompson, Gazel and Rickman study of 1996, the researchers found that, "that the casino or near casino counties had rates of major crimes 6.7% higher than expected and Part II offense arrest rates were 12.2% higher than non-casino counties. They concluded that the introduction of casino gambling is associated with increased crime." (Thompson, Gazel, & Rickman, 1996). This

increase in crime will not be isolated in a remote area, focused on the casino. It will spread into multiple nearby residential neighborhoods.

- In addition, there are several elementary schools and two high schools within a 7-mile area of the proposed casino. This increase in crime will play out in the lives of these youth and, without a doubt, be an enticement to them in terms of underage drinking and possible crime.

- Traffic in our area has already been increased due to the shopping center on Shiloh and the Sonoma County Airport area. Most days the commute to work involves a 20-minute journey from Old Redwood highway to the freeway access at Shiloh and 101. There is no other clear pass for an on ramp, since all potential pathways run directly through residential neighborhoods. There is no place for traffic to a casino and 200-room hotel to go but onto Shiloh and Old Redwood Highway. This will create incredible backups and traffic issues, increase accidents and clog the flow of movement for everyday life in the area.

- Our neighborhoods that directly adjoin the proposed casino property have all been evacuated consistently during fires in Sonoma County. The evacuations cause traffic. In the Tubbs fire, as you know, lack of planning for traffic in emergencies caused deaths due to people not being able to drive or get to safety fast enough. We are very concerned that a casino will exacerbate this issue in our area, causing horrific impacts that can be avoided.

- While we understand that tribal land developments are not held to CEQA standards, the surrounding areas are. We have red tailed hawks, barn owls, fox, flowers, bobcats and many other forms of wildlife in our area. We see them frequently. There is no way that a development in that vineyard will not significantly damage the environmental surroundings and wildlife present.

- We already have infrastructure issues in our area. Cable lines are overloaded and have not been upgraded. Internet is not strong. To put the size of a development proposed, with the individual televisions, internet connections and technology needs required of a hotel and casino, would completely damage the ability of our neighborhoods to enjoy such needed activities as working from home or basic recreation such as watching a movie at home. In addition, we are in a drought and already limiting our water intake, plant care, etc at the request of the city and county. To put this large a facility in the middle of a fire zone affected by drought seems irresponsible and very inequitable to the local residents being asked to cut back.

For all these reasons, we feel this casino must be stopped. We are asking for your support in stopping this development. We are happy to discuss any further points with you. Thank you for your consideration.

Respectfully,

Paige Mazzoni and Brad Pighin

From: Lynette McGee
Sent: Monday, June 20, 2022 5:48 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi casino

Dear Mr. Broussard:

I do hope that part of your consideration of this poorly conceived project includes the impact of the project on adjoining residential neighborhoods and playgrounds.

The proposed project area of Shiloh Road has inadequate traffic patterns for such a large scale project. The project will largely use the Shiloh Road exit off Highway 101. That exit, which is the main access to the western portion of Windsor, main access to a local regional park, and main access to large shopping center, is one lane. This one lane is adequate for current use, but the addition of this massive project alongside existing residences and on the very tight road to one of our regional parks is a traffic nightmare for the future.

Putting aside my objections to the casino itself, any large scale entertainment proposal for this site is unworkable. We would have the same problem with a theme park or Six Flags. This site is residential/agricultural in nature, currently used for vineyards.

I ask you to give careful consideration to the enormous negative impact on the Town of Windsor and its residents. I support the need for *actual* local tribes to seek casino licenses, and we have two casinos within a 20 minute drive of this location. But neither of the casinos are in residential neighborhoods. Also, the Koi *are not* a Sonoma County tribe. They should not be permitted to encroach into another tribe's sovereign territory.

I note that this was a clever but disingenuous purchase by the KOI. They kept it silent, so as to avoid local uproar, and they made sure that the project would lie adjacent to, but beyond the town limits of Windsor. However, do not be misled that this "county land" is somewhere far afield from our playgrounds and neighborhoods. To the contrary it is right in the middle of an active corridor for Windsor residents and visitors to our regional park. The proposed site is across the street from residences and a local church, this is not the place for a casino.

Furthermore, we are in a drought. We are trying hard to conserve this precious resource. This will put more burden on an already taxed system. These types of development are awful for our climate change influenced environment, and will destroy the agricultural feel and scenic beauty of our small part of Sonoma County.

Please reject this proposal. I request that my name and email address be added to all future mailings or announcements for this project.

Thank you for your attention to this matter.

Sincerely,

Lynette McGee

From: Spencer Pahlke

Sent: Monday, June 20, 2022 8:35 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; Dutschke, Amy <Amy.Dutschke@bia.gov>

Cc: Tina Sessions <tsessions@gmail.com>; Spencer Pahlke <spahlke@WalkupLawOffice.com>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke / Chad Broussard

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

My family and I live in the Mayacamas Mountains. We are deathly afraid of wildfire. Every night we sleep with our phones with ringers on, ready for the call telling us to evacuate with our 4-year-old daughter and 2-year-old son. Our only evacuation route would take us right by this proposed casino. I cannot imagine—for a moment—attempting to evacuate this area, prone to fast-spreading blazes, with 27,000 casino visitors ahead of us. We would all be at grave risk of serious injury or death, including every person at the casino.

And of course the reason for the significant fire risk in the area is the ongoing drought. Every time my son turns on the faucet when he's playing, I get cross with him and tell him to turn it off. We tore out our lawn. We recycle water from our shower. We do everything we can to preserve this precious and utterly crucial natural resource. Adding a 400-bed hotel—the largest in Sonoma County—at the epicenter of our drought problems would be beyond foolish, and would put the whole community at risk. Even a casino will be of no value if it has no water.

Please consider these and the many other reasons that exist for not moving forward with this project.

Thank you,
Spencer

From: Anya Piazza-Lyons
Sent: Monday, June 20, 2022 11:51 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Thank you for considering my comments.

Anya Piazza-Lyons
17310 HWY 116
Guerneville, CA 95446

From: Tina Sessions

Sent: Monday, June 20, 2022 9:04 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; Dutschke, Amy <Amy.Dutschke@bia.gov>

Cc: Spencer Pahlke <spahlke@walkuplawoffice.com>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke / Chad Broussard

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

I first ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I also ask that the following issues be studied fully:

Fire Danger Increase. The destruction of green space, including vineyards, at the proposed casino site will dramatically increase fire risk to the community, including by removing a natural firebreak and reducing defensible space for nearby residential communities.

Fire Evacuation Risk. The fire evacuation routes surrounding the proposed project are single lane roads that cannot be expanded. Evacuation must happen at a moment's notice and will already clog these roads. Adding an enormous casino and hotel to this already stretched evacuation route will make things far worse. Please consider how the myriad casino guests will be able to evacuate safely without also preventing all nearby residents from evacuating safely as well.

Water Usage and Drought Impact We are in the midst of an historic drought. All of us in the residential neighborhoods surrounding the proposed project do our part to conserve water. Adding an enormous hotel and casino in the middle of the drought will consume far too many precious resources in the construction and then ongoing operation, not to mention increase water demands by bringing in hundreds of people every day.

Close Proximity to Residential Neighborhoods. Residential neighborhoods begin less than 50 feet from the proposed site. Please study the impacts of increased traffic, noise, air and light pollution on the quality of life in these established neighborhoods.

Thank you for considering my comments,
Justina Sessions

From: Ramona Turner

Sent: Monday, June 20, 2022 4:12 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] "Koi Nation Shiloh Resort and Casino Project"

We strongly protest a casino being built in this area. The infrastructure simply cannot sustain a development of this magnitude and it will have a severe negative impact on not only the surrounding neighborhood but the entire north portion of Sonoma County.

From: betty winholtz

Sent: Monday, June 20, 2022 11:11 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

1. There are areas in Sonoma County more appropriate for a high volume 24/7 business. **Please study alternative sites for this business.** Visitors come here for the aesthetics of the area which is generally bucolic, rolling hills, forest. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area.

2. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. **Please assess the possibility that there will be a public health impact** due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

3. **Please study the location of the other 47 casinos** in Northern California and identify casino resorts, i.e. are they built in residential areas, rural, business zones, closeness to other casinos.

Sincerely,
Betty Winholtz

From: Diane and Walter Winsby
Sent: Monday, June 20, 2022 9:11 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action with a comment period that opened on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process. My concerns regarding this project are:

1. How many residents will be impacted by traffic/noise/light pollution/loss of scenic corridor/inflow of tens of thousands of visitors daily into the area which will cause increased crime, intoxication, prostitution, etc?
2. There currently is a 2-lane road from the freeway to the proposed site - has a study been done on how the huge increase in traffic will be handled on Shiloh Road and on the US101?
3. The loss of grape vines/oak trees on the project site as well as the increased traffic, air pollution, light pollution and noise in the area will change the aesthetics of the residential neighborhoods very close to the project which will result in the decline of residential property values in the area. It will be located just 50 feet from a nice residential housing area. A study needs to be made to look at all these concerns.
4. The proposed site of the Koi casino/resort is in an area that had been set aside some years ago to be a long term/permanent green belt...why should this casino be built here especially when it is so close to many residential homes, apartments, mobile homes, churches, schools and neighborhood parks? A study needs to be conducted as to the impacts of this project to the neighborhoods surrounding it.
5. The Koi tribe is not indigenous to Sonoma Co. area and there are five Sonoma Co. indigenous tribes who do not support their entry into So. Co. There are already 47 casinos in northern California which need to be studied for the impacts of the casinos on local residents; there are

already 3 casinos in a 30-mile distance along US101 in So. Co. How will this new casino impact the existing casinos' business?

6. The surrounding neighborhood has escaped two huge wildfires since 2017 largely due to the grape vines that are on the property of the proposed casino. When they are gone the area will be subjected to increased fire danger in the future. A study on the environmental impact of potential fires and the casino's use of available water because of the drought. Future fire evacuation of the area will be impacted due to the huge increase in traffic which could cause loss of life.

7. Wildlife in the area will be impacted as well as the creek and endangered Valley Oaks. Wildlife is common in the area now, what will happen to them?

8. Where will the water come from for the casino? We are now experiencing a drought and have had to curtail water use....how will the casino impact our water availability? Obviously, I could point out many other concerns about the Koi tribe project. There needs to be much more public input to this project as there are many, many questions that need to be answered on how this project will affect our county and our neighborhood. Appreciate your consideration of my concerns. Thank you.

Diane K. Winsby
212 Chris Street
Windsor, CA 95492

Diane & Walter Winsby
Drapes & More Interiors
mail: 422 Larkfield Center, Box 261
Santa Rosa, CA 95403
website: www.drapesandmore.com

From: Walter Winsby
Sent: Monday, June 20, 2022 9:13 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action with a comment period that opened on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.
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2. There currently is a 2-lane road from the freeway to the proposed site - has a study been done on how the huge increase in traffic will be handled on Shiloh Road and on the US101?
3. The loss of grape vines/oak trees on the project site as well as the increased traffic, air pollution, light pollution and noise in the area will change the aesthetics of the residential neighborhoods very close to the project which will result in the decline of residential property values in the area. It will be located just 50 feet from a nice residential housing area. A study needs to be made to look at all these concerns.
4. The proposed site of the Koi casino/resort is in an area that had been set aside some years ago to be a long term/permanent green belt...why should this casino be built here especially when it is so close to many residential homes, apartments, mobile homes, churches, schools and neighborhood parks? A study needs to be conducted as to the impacts of this project to the neighborhoods surrounding it.
5. The Koi tribe is not indigenous to Sonoma Co. area and there are five Sonoma Co. indigenous tribes who do not support their entry into So. Co. There are already 47 casinos in northern California which need to be studied for the impacts of the casinos on local residents; there are already 3 casinos in a 30-mile distance along US101 in So. Co. How will this new casino impact the existing casinos' business?

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Obviously, I could point out many other concerns about the Koi tribe project. There needs to be much more public input to this project as there are many, many questions that need to be answered on how this project will affect our county and our neighborhood. Appreciate your consideration of my concerns. Thank you.

Walter S. Winsby
212 Chris Street
Windsor, CA 95492
(707) 481-5323

From: Denis Ziskin
Sent: Monday, June 20, 2022 7:18 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Casino and Resort Project

June 20, 2022

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

Subject: Koi Nation Shiloh Resort and Casino Project

I have been a resident of Oak Park in Windsor for the past 30 years. This is the residential neighborhood directly across the street from the proposed casino resort. I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in

2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into

this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess

how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacamas foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups

come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County.

Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor’s Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired

emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

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Thank you for considering my comments. I would like to see no action taken on this application and a denial of the proposed project.

Denise Ziskin
5862 Leona Court
Windsor, Ca. 95492

From: Claudia Abend
Sent: Tuesday, June 21, 2022 1:58 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation Shiloh resort and casino project

Amy Dutschke
Regional director
Bureau of Indian affairs, pacific region
2800 cottage way, Sacramento, ca 95825

I am writing to provide scoping comments on the proposed koi nation Shiloh resort and casino project . First of all there needs to be more time for public comment on a proposed project of this size .. This time period included federal holidays let alone 30 days is not enough time . This project would significantly have a negative impact on our community , environment and way of life ! Thus deserves a full EIS analysis with public input ! The proposed project area includes family parks, wild life parks ,schools ,residential homes,and churches. This is not a good fit for casino /resort activities. Increased crime , sex trafficking, drug trafficking and driving under the influence tends to increase around this activity. We don't want to have Las Vegas in our front and backyard! The large influx of traffic and population would be a strain on our narrow roads ! This is a real hazard for evacuation for our community as was very apparent with our last 2 fires in the area ! A hazard that is not going away with climate change and increasing drought years . Any other hazard that would call for Mass evacuations of our community would be greatly affected as well . This project and increased population will strain our area ground well water levels and quality! The area proposed is supposed to be a green belt agriculture barrier! This project needs to be somewhere in lake county.. closer to the koi nation's true roots ! Our community has been here for most of our lives ... the koi nation just recently bought this property without community and neighborhood input of such a big impact and change of our lives! This is not the right area for this project!

Thank you for considering my comments .

Claudia Abend
5925 old redwood hwy
Santa Rosa ,ca
95403. Across the street from this proposed mess !

From: William Ardizoia

Sent: Tuesday, June 21, 2022 11:06 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

No significant connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Contra Costa County and Alameda County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Water rationing. The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will go dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the

impact of the proposed casino project's water use will have on residents and wells. During times of water restriction, how will water use by the casino resort be regulated and monitored so that the surrounding communities are not adversely impacted by their water use?

Wildfire Risk. The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Department response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincadee Fire 2019. Please study the management of wildfire fighting in the recent past and expected management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing projects across the street from Esposti Park. Instead of having more space for the fire to be contained, will firefighters have to choose to protect the neighborhood or the casino?

Impact of Ignoring Zoning Restrictions. Please study the impact of these significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as a vineyard the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of FloodPlain will cause consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, will cause consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural vista to Shiloh Regional Park and the Mayacama foothills, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti

Park
and Shiloh Regional Park.

Local Indigenous Tribes. The five local indigenous (of which the Koi are not) tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos. Please study the location of the other
47
casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County; 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel; 3) built in rural areas isolated from established residential communities; 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos); 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Inappropriate scope of project, The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Thank you for considering my comments.

William C. Ardizoia

7111 Shiloh Ridge Road
Santa Rosa, CA 95403

From: Pat Duffy
Sent: Tuesday, June 21, 2022 12:49 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County;. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel;. 3)

built in rural areas isolated from established residential communities;. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos);. 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa. This proposal makes absolutely no business sense since the other Sonoma County casinos draw from the same trade areas.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location – Please study

how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor by the inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools

served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shifts, peace and quiet during the day.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the drought, and the impact of building and operating a business that will consume massive amounts of water out of the local aquifer.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to

support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community.

Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood.

Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles

that will be called to the Shiloh location – how loud are the sirens on these vehicles? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Thank you for considering my comments.

Kathleen P. Duffy
7111 Shiloh Ridge Road
Santa Rosa, CA 95403

From: Kathleen Huhn

Sent: Tuesday, June 21, 2022 7:19 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am writing to voice our strong opposition to the proposed casino off of Shiloh Road. As you are no doubt aware, the Koi Tribe from Lake County has recently purchased vineyard acreage adjacent to a series of single-family residential neighborhoods, located at the crossroads of Old Redwood Highway and East Shiloh in North Santa Rosa/Windsor. They have announced plans to build a large casino complex, including multiple restaurants and a 200-room hotel. Our neighborhood, and all neighborhoods in the surrounding area, are very distressed by this plan and ask for your support in stopping this development. While we understand the need to address the wrongs committed against indigenous people in our country, we are confident that this proposed development is not an appropriate manifestation of those efforts. There are several reasons for our lack of support:

- It is well documented that the Koi tribe comes from Lake County. That is their tribal heritage and land. They did have a trade route through Sonoma County. All history and knowledge of this trade route shows that the path followed the Russian River and did not pass through the Windsor area. That was not the direct path followed. There should be no claim to this land as tribal land for a tribe from Lake County, either inherently or via a trade route. Rather, the land is prime real estate that is attractive. That does not justify tribal trust land jurisdiction.

- The neighborhoods adjacent to this proposed casino are middle class, mostly long-time resident neighborhoods. We are families, retired couples and citizens that have invested in our properties for a lifetime, planning to retire in the area because it is quiet, safe and family oriented. To introduce a casino in the midst of these neighborhoods would immediately and irreparably damage both the quality of the residents' lives as well as their lifetime investments.

- It is well established that casinos cause an increase in prostitution, drunk driving and crime in the immediate area. In the Thompson, Gazel and Rickman study of 1996, the researchers found that, "that the casino or near casino counties had rates of major crimes 6.7% higher than expected and Part II offense arrest rates were 12.2% higher than non-casino counties. They concluded that the introduction

of casino gambling is associated with increased crime.” (Thompson, Gazel, & Rickman, 1996). This increase in crime will not be isolated in a remote area, focused on the casino. It will spread into multiple nearby residential neighborhoods.

- In addition, there are several elementary schools and two high schools within a 7-mile area of the proposed casino. This increase in crime will play out in the lives of these youth and, without a doubt, be an enticement to them in terms of underage drinking and possible crime.

- Traffic in our area has already been increased due to the shopping center on Shiloh and the Sonoma County Airport area. Most days the commute to work involves a 20-minute journey from Old Redwood highway to the freeway access at Shiloh and 101. There is no other clear pass for an on ramp, since all potential pathways run directly through residential neighborhoods. There is no place for traffic to a casino and 200-room hotel to go but onto Shiloh and Old Redwood Highway. This will create incredible backups and traffic issues, increase accidents and clog the flow of movement for everyday life in the area.

- Our neighborhoods that directly adjoin the proposed casino property have all been evacuated consistently during fires in Sonoma County. The evacuations cause traffic. In the Tubbs fire, as you know, lack of planning for traffic in emergencies caused deaths due to people not being able to drive or get to safety fast enough. We are very concerned that a casino will exacerbate this issue in our area, causing horrific impacts that can be avoided.

- While we understand that tribal land developments are not held to CEQA standards, the surrounding areas are. We have red tailed hawks, barn owls, fox, flowers, bobcats and many other forms of wildlife in our area. We see them frequently. There is no way that a development in that vineyard will not significantly damage the environmental surroundings and wildlife present.

- We already have infrastructure issues in our area. Cable lines are overloaded and have not been upgraded. Internet is not strong. To put the size of a development proposed, with the individual televisions, internet connections and technology needs required of a hotel and casino, would completely damage the ability of our neighborhoods to enjoy such needed activities as working from home or basic recreation such as watching a movie at home. In addition, we are in a drought and already limiting our water intake, plant care, etc at the request of the city and county. To put this large a facility in the middle of a fire zone affected by drought seems irresponsible and very inequitable to the local residents being asked to cut back.

For all these reasons, we feel this casino must be stopped. We are asking for your support in stopping this development. We are happy to discuss any further points with you. Thank you for your consideration.

Respectfully,

Scott and Kathleen Huhn

From: Linda Leao

Sent: Tuesday, June 21, 2022 7:35 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Casino proposal / environmental impact

As homeowners off Shiloh Ridge we are very opposed to the proposed opening of a casino within a third of a mile if not closer to a quiet residential area. Shiloh Rd , which ultimately would be one of only 2 access exits off of freeway is essentially a two lane road predominantly serving residences and Walmart . The amount of traffic, people from other areas, parking, noise, crime (related to alcohol and late opening hours) will severely affect our neighborhood. We are not against Casinos per-se but their placement should never be within quiet suburban communities. I know many people who will ultimately sell their homes if this plan goes forward....hoping that the negative aspects rendered here are taken into consideration.

Linda & Richard Leao

From: suzibill

Sent: Tuesday, June 21, 2022 11:22 AM

To: Dutschke, Amy <Amy.Dutschke@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

TO:

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. I live in Windsor, just 2 miles from the site. Here are my concerns-I ask that you please consider these issues prior to making a decision regarding this location.

The project, with the tens of thousands of visitors daily, will bring a dramatic increase in traffic, noise, air pollution, 24/7 artificial light pollution and rural road congestion to the entire surrounding area. This area is not a business park, but rather a residential/agricultural area with a community/family park directly across the road and an elementary school a mile away.

Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino and resort at this location will impact the landscape, residential life, and community activities of the whole surrounding area. It will overwhelm the resources of the public, including the diminishing residential water supply, road maintenance, emergency/wildfire evacuation routes and resources for fighting fires and managing crime.

Impact on residents and surrounding communities:

Local air pollution and public health

In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles).

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Water demands/supply:

Much of Sonoma County, including Windsor and Santa Rosa, is under mandatory water restriction and the likelihood of supplies worsening with global warming. Our community is currently building some much needed affordable housing. Please study what the water demands, both now and in the future, would be for a resort project of this size. Please study the current and long term projections for the local water table, local water needs and if our community could withstand the loss of water supply to this project.

Pressure on local fire/police/emergency responders capabilities

This property, and the whole surrounding area is subject to intense and fast moving wildfires. Unless you have lived through this, you have no idea of what it is like. Not only would visitors to a casino resort be at risk, the whole community would be in jeopardy of having the designated escape/evacuation routes overwhelmed and in complete gridlock, with emergency vehicles unable to operate. All roads leading to and from the designated property are two lanes only. For residents in the immediate area and the hills above, Shiloh Road is the main, and in some cases, the only escape route out.

Please, please study these scenarios carefully. Give priority to preventing more loss of life, homes, businesses and more trauma to a community.

Community/family/child safety

Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high school in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, and Wikiup/Larkfield - and how the inflow of tens of thousands of visitors daily into area would affect rates of crime and traffic accidents in the surrounding areas. Look at the police/fire statistics from casinos in Northern California and identifying casino resorts in particular that are built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use.

Decline in property values

Please study and consider the expected decline in property values both during construction of such a project, and in the long term. Homes and housing units impacted by the direct visibility of the large buildings, parking lots, and bright lights, and the flux of vehicles to/from the casino resort -plus the noise of the increased vehicular traffic and entertainment - will most likely experience a decline in property values and quality of life. The 24/7 presence will significantly decrease the desirability of buying into the area and lower current residents ability rest at night and to use and enjoy their outdoor living spaces.

There are areas in Sonoma County more appropriate for a high volume 24/7 business. Please study alternative sites for this business.

I do thank you for reading and considering my letter.

Sincerely, Suzanne Malay

From: suzibill

Sent: Tuesday, June 21, 2022 11:57 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To Chad Broussard or Whom it may Concern:

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for considering my comment,

Suzanne Malay

From: matthew maring
Sent: Tuesday, June 21, 2022 7:32 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

My concerns include but are not limited to....

1.) Crime – *Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.*

2.) Children exposed to undesirable people at Esposti Park – *Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.*

3.) Close proximity to schools – *There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.*

Thank you for considering my comments.

*Matthew Maring
Po Box 14
Windsor, CA 95492*

From: Michael Mayer

Sent: Tuesday, June 21, 2022 12:04 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL]

Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

location. This is completely FALSE. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel

Thank you very much for considering our comments and concerns.

Sincerely,

Michael and Kathi Mayer

Aesthetics – Visitors come to Sonoma County for the aesthetics of this area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate the same aesthetics. This project destroys the beauty of the region, building a gambling casino resort, with buildings, parking lots and structures, artificial light, traffic and congestion and crime,

inside a residential area. There are commercial areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and

off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger

vehicles. The EPA has found that people who live, work or attend school near major roads appear to have

an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location – Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/inflow of tens of thousands of visitors daily into the area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton,

Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life, detriment to public safety: impairment during wildfire evacuation, intoxicated driving, crime; residential property devaluation, noise, detriment to

residential life activities due to casino resort location across street from two popular public parks, interference with residential transit routes by visitors to the casino. Please study how this decline in property values impacts the owners' equity and financial standing.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic

from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly. Traffic noise from Hwy 101 can be heard over 5 miles away at the top of Shiloh Regional Park and the Mayacama foothills.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Please study the additional volume of casino visitors' /employee cars, service trucks and traffic on Shiloh Road will harm public safety while biking, walking, running, and exercising on Shiloh Road. Please study the safety of bike riders during tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or

about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please

study the impact on human health for all residents and visitors to the areas adjacent to the casino.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches, and study how many members of these churches will be adversely impacted.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air and into the soils of the residential neighborhood. The construction vehicles will add

additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what

they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this

neighborhood. What is the impact of toxic construction materials deposited in the soils with rain events? How will the drainage waters from the parcel,

including the water in the Riparian corridor, be monitored for toxins? How will the water discharge from the site be monitored for toxins?

Crime – Despite denials from the casino communities, data support the fact that crime increases in areas with casinos. Gambling addiction, and the need for a revenue stream to feed this, increases theft. 24 hour bar activity, both alcohol and cannabis, will increase incidents of intoxicated driving; gambling casinos also attract drug dealers, gangs, and prostitution. Please study the incidence of crime around large casinos and the impact on the entire residential family

community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic,

compounding traffic congestion and gridlock, and decreasing public safety.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife habitat and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone.

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre->

[2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf](https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf)

Please study the risk to customers on this site from dam failure due to earthquake, flood or other triggering events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction

occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high fire risk area or a residential family neighborhood. The detrimental impact on the existing residential communities and small businesses is too great. This is the wrong location for a business like this. Please study the number of residents, school children, visitors to Esposti Park and Shiloh Regional Park, Churches, and small businesses that will be impacted by an overwhelming casino resort at this location.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increased drunk/intoxicated drivers in a residential family neighborhood/community; please study the incidence of DUI during daytime hours and evening to morning hours; please evaluate the number of residents at risk who work normal daytime hours, evening and night shift hours; please evaluate the number of school children going to/ returning from the nearby schools; please study the number of nearby schools that have events at Esposti Park and Shiloh Regional Park and the risk to their public safety and health with a casino resort across the street.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the

drought, and the impact of building and operating a business that will consume massive amounts of water out of the local aquifer.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and to the visitors/ employees/vendors/ and service personnel of this proposed project. Please study the evacuation strategy for a sudden catastrophic event for the casino resort and surrounding residential communities.

Economic Impact - Please study the economic impact of another casino resort on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural areas that the Dept of Interior originally designated as locations suitable for casinos, away from urban and residential areas.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please thoroughly study the full impact to the local economy, including taking business away from the true local indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair emergency response; please study how the increase in traffic

will add to the duration of gridlock as well.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or

night. This type of business operates 24 hours a day seven days a week.

Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards/ loss of green belt space

Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard. The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods.

Fire Season is year-round and increasing – Please study the number of days of unhealthy air quality (NOAA) from 2017 to the present due to wildfire smoke in Sonoma County. Please study the number of days annually when the public is advised to stay indoors and/or is cautioned about working or exercising outdoors due to wildfire smoke. Please study how smoke and poor

air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the decrease in visitors to the “Hwy 101 corridor of casinos” will be on a 4th casino resort’s revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, making transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Floodway- In prior years, Pruitt Creek has flooded, overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking

areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff instead of absorption into the ground.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park, habitat for predator birds, wild birds, coyote, fox, possum, skunks, racoons, bobcats and a variety of reptiles and amphibians who venture into the vineyard and

Pruitt Creek in search of food and water. These beneficial animals also are predators for a rodent population that will overtake the area when their natural habitat is destroyed. Pruitt creek is designated a critical habitat, a Riparian corridor, and is an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife. Please study the increase in rodents and rats when the beneficial predators are chased out of their habitat.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community.

Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles ? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the

property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/wildfire risk outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. Please study if these power outages will adversely impact the established residences/ schools and small businesses with the addition of a casino resort at this location.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- A casino resort is an improper use of the Land Intensive Agricultural zoning for the parcel and is totally out of character with the local environment. The casino project will be replacing valuable vineyard with concrete and heavy commercial activity. The loss of valuable vineyard land in Sonoma County should not be allowed because this quality of land/ vineyard potential is limited to specific areas in Sonoma County. The vineyards are the foundation of the Sonoma County Wine Country tourism business. The loss of scenic vistas and loss of aesthetic quality in this area should not be allowed. This is one of those special vineyard locations. To replace this land with an estimated 10,000 to 20,000 visitors a day, plus employees, vendors, delivery drivers, should not be allowed. Please study the impact of loss of valuable vineyard/ agricultural land on the residents and visitors who come to this area to see vineyards and open space and enjoy the special character of Shiloh Regional Park.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study

the possibility of local air pollution and the public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NO_x, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic

from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes

located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels, and degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on the local area and on downstream water flows.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months every year, and for slightly shorter times during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current level of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact the stress and welfare of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the

riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from points all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking

eastward; also a casino resort will be immediately visible and heard from vista points on the west-facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and

from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups.

These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH. Please study the impact of loss of venue along Faught and Shiloh Roads for these athletic and outdoor events on the local small businesses.

Loss of Open Space- The proposed casino site is on open space/ vineyard land with a Riparian Corridor that is designated as protected habitat for the Valley Oaks and for wildlife. Please study the impact of the casino project’s long term continuous day and night operation on the animal and plant habitat in the surrounding neighborhoods, Esposti Park and Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come.

Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas

mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. Please study the impact of continuous noise, sirens, alarms at all hours on the residents' many pets and their mental health and stress levels, which will certainly exacerbate the elevated stress levels of the neighborhood residents.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal.

Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks. Please study the number of activities that have been organized at Esposti Park and at Shiloh Regional Park in the last 10 years.

No significant connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County

and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - Please study the noise from increased traffic during construction and after completion – please study the expected noise from construction and for how many years before the structure would be completed; please study the noise from entertainment at casino resort, both indoors and outside, and at special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day and night operation of the proposed casino project. Please study what the impact the noise levels during day and night operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of a gambling casino bringing tens of thousands of visitors to the area on the existing quality of peaceful and quiet enjoyment of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and each year for the last 10 years. Please study the

number of people using Shiloh Road between Esposti Park and Shiloh Regional Park as a main route for daily exercise and activity for the past 10 years.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location. Please identify the small businesses adjacent to the parcel and describe the businesses and their activity, the number of employees, their hours of operation, and their direct impact on the surrounding residents; please identify the residential areas and the number of residents along Old Redwood Highway from Shiloh Road to Airport Blvd, and along Shiloh Road to Fulton to Airport Blvd. Please identify the many residential areas that surround the Shiloh parcel, how many homes and apartments exist, and how many residents live here.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road - please study impaired evacuation during wildfire emergency; impaired emergency response when traffic is gridlocked – ambulance, fire, police, sheriff, CHP, and please study the increase in noise causing sleep disturbance, stress,

and harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and traffic slowdowns and stoppage occurs daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was heavily congested because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic. Please study the increase in emission toxins due to idling vehicles on the highways and roads for hours.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by all

residents in the surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will go dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells. During times of water restriction, how will water use by the casino resort be regulated and monitored so that the surrounding communities are not adversely impacted by their water use?

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the

freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light

pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting in the recent past and expected management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project

across the street from Esposti Park. Instead of having more space for the fire to be contained, will fire fighters will have to choose to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well as little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of these significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County.

Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain will cause consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, will cause consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural vista to Shiloh Regional Park and the Mayacama foothills, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

From: Patrick Munsch

Sent: Tuesday, June 21, 2022 6:37 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

6/21/2022

To: Bureau of Indian Affairs, Pacific Region

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I'm an avid cyclist and multimodal commuter and ride through the area the casino would be constructed. It's already not a very bicycle friendly environment and will be much worse with a huge increase in traffic and pollution, and even worse is all the impaired drivers leaving the casino, which places all us vulnerable road users in more danger if the casino is built. How are we ever to safely access Shilo Park if the casino is built?

Here are a couple more considerations;

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton

Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Thank you for considering my comments.

Patrick Munsch

Pobox 397

Sebastopol, CA 95472

From: Kenneth Pietrelli

Sent: Tuesday, June 21, 2022 4:44 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

My comments are as follows:

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma

County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high fire risk area or a residential family neighborhood. The detrimental impact on the existing residential communities and small businesses is too great. This is the wrong location for a business like this. Please study the number of residents, school children, visitors to Esposti Park and Shiloh Regional Park, Churches, and small businesses that will be impacted by an overwhelming casino resort at this location.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the drought, and the impact of building and operating a business that will consume massive amounts of water out of the local aquifer.

Economic Impact - Please study the economic impact of another casino resort on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural areas that the Dept of Interior originally designated as locations suitable for casinos, away from urban and residential areas.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair emergency response; please study how the increase in traffic will add to the duration of gridlock as well.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the

Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. **Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete. This is one of my biggest concerns.**

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Floodway- In prior years, Pruitt Creek has flooded, overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff instead of absorption into the ground.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800- acre Shiloh Regional Park, habitat for predator birds, wild birds, coyote, fox, possum, skunks, racoons, bobcats and a variety of reptiles and amphibians who venture into the vineyard and Pruitt Creek in search of food and water. These beneficial animals also are predators for a rodent population that will overtake the area when their natural habitat is destroyed. Pruitt creek is designated a critical habitat, a Riparian corridor, and is an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife. Please study the increase in rodents and rats when the beneficial predators are chased out of their habitat.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels, and degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on the local area and on downstream water flows.

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

No significant connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

US Highway 101 impact- US highway 101 has become increasingly congested and traffic slowdowns and stoppage occurs daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was heavily congested because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the

impact on surrounding road infrastructure in light of the significant increase in traffic. Please study the increase in emission toxins due to idling vehicles on the highways and roads for hours.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will go dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells. During times of water restriction, how will water use by the casino resort be regulated and monitored so that the surrounding communities are not adversely impacted by their water use? Thank you for considering my comments.

Kenneth D. Pietrelli
4873 Hoen Ave., Santa Rosa, CA 95405

SECOND REQUEST!
IMMEDIATE ACTION NEEDED!!!

This is the second and **MOST IMPORTANT REQUEST!**

It is urgent that you respond to this request IMMEDIATELY.

On May 27, 2022, The Press Democrat published a Notice of Preparation of Environmental Assessment/Tribal Environmental Impact Report. What this means to our fight against the proposed casino location is that the **Scoping Comment period ends June 27th.**

This is the ONLY TIME we will be able to let the **BUREAU OF INDIAN AFFAIRS (BIA)** know our specific environmental concerns related to the proposed casino site.

DEADLINE 6/27

WHAT: Send an **email** (preferred method) or **mail** to the BIA

Select all or some of the Statement of Issues that you feel strongly about.

EMAIL to: Chad.broussard@bia.gov

Or Mail to: Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

When: **NOW!** As soon as you receive this message.

MORE: **Please share this request with everyone you possibly can. We want thousands of emails sent.**

If you prefer, mail to:
Amy Dutschke ,Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

Date _____

To: Bureau of Indian Affairs, Pacific Region

Re: Scoping Comments on the proposed Koi Nation Shiloh Resort and Casino Project

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

[\(insert comments here\)](#)

Thank you for considering my comments.

(Commenter's Name)

(Commenter's return Mailing Address on first page of comments)

If you prefer, email to: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

[Add Comments here.](#)

Thank you for considering my comments.

**Scoping List of Issues and Comments - Koi Nation Shiloh Resort and Casino project
June 17, 2022**

Aesthetics – Visitors come to Sonoma County for the aesthetics of this area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate the same aesthetics. This project destroys the beauty of the region, building a gambling casino resort, with buildings, parking lots and structures, artificial light, traffic and congestion and crime, inside a residential area. There are commercial areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location – Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as

entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life, detriment to public safety: impairment during wildfire evacuation, intoxicated driving, crime; residential property devaluation, noise, detriment to residential life activities due to casino resort location across street from two popular public parks, interference with residential transit routes by visitors to the casino. Please study how this decline in property values impacts the owners' equity and financial standing.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly. Traffic noise from Hwy 101 can be heard over 5 miles away at the top of Shiloh Regional Park and the Mayacama foothills.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Please study the additional volume of casino visitors'/employee cars, service trucks and traffic on Shiloh Road will harm public safety while biking, walking, running, and exercising on Shiloh Road. Please study the safety of bike riders during tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy

of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the impact on human health for all residents and visitors to the areas adjacent to the casino.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches, and study how many members of these churches will be adversely impacted.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air and into the soils of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood. What is the impact of toxic construction materials deposited in the soils with rain events? How will the drainage waters from the parcel, including the water in the Riparian corridor, be monitored for toxins? How will the water discharge from the site be monitored for toxins?

Crime – Despite denials from the casino communities, data support the fact that crime increases in areas with casinos. Gambling addiction, and the need for a revenue stream to feed this, increases theft. 24 hour bar activity, both alcohol and cannabis, will increase incidents of intoxicated driving; gambling casinos also attract drug dealers, gangs, and prostitution. Please study the incidence of crime around large casinos and the impact on the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution,

and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife habitat and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other triggering events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high fire risk area or a residential family neighborhood. The detrimental impact on the existing residential communities and small businesses is too great. This is the wrong location for a business like this. Please study the number of residents, school children, visitors to Esposti Park and Shiloh Regional Park, Churches, and small businesses that will be impacted by an overwhelming casino resort at this location.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increased drunk/intoxicated drivers in a residential family neighborhood/community; please study the incidence of DUI during daytime hours and evening to morning hours; please evaluate the number of residents at risk who work normal daytime hours, evening and night shift

hours; please evaluate the number of school children going to/ returning from the nearby schools; please study the number of nearby schools that have events at Esposti Park and Shiloh Regional Park and the risk to their public safety and health with a casino resort across the street.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the drought, and the impact of building and operating a business that will consume massive amounts of water out of the local aquifer.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and to the visitors/ employees/ vendors/ and service personnel of this proposed project. Please study the evacuation strategy for a sudden catastrophic event for the casino resort and surrounding residential communities.

Economic Impact - Please study the economic impact of another casino resort on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural areas that the Dept of Interior originally designated as locations suitable for casinos, away from urban and residential areas.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please thoroughly study the full impact to the local economy, including taking business away from the true local indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair emergency response; please study how the increase in traffic will add to the duration of gridlock as well.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory

evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards/ loss of green belt space

Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods.

Fire Season is year-round and increasing – Please study the number of days of **unhealthy air quality** (NOAA) from 2017 to the present **due to wildfire smoke** in Sonoma County. Please study the number of days annually when the public is advised to stay indoors and/or is cautioned about working or exercising outdoors due to wildfire smoke. Please study how smoke and poor air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the decrease in visitors to the “Hwy 101 corridor of casinos” will be on a 4th casino resort’s revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire.

Floodway- In prior years, Pruitt Creek has flooded, overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff instead of absorption into the ground.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park, habitat for predator birds, wild birds, coyote, fox, possum, skunks, racoons, bobcats and a variety of reptiles and amphibians who venture into the vineyard and Pruitt Creek in search of food and water. These beneficial animals also are predators for a rodent population that will overtake the area when their natural habitat is destroyed. Pruitt creek is designated a critical habitat, a Riparian corridor, and is an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife. Please study the increase in rodents and rats when the beneficial predators are chased out of their habitat.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE.

The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks' sirens, alarms, visitors' car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/wildfire risk outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area. Please study if these power outages will adversely impact the established residences/ schools and small businesses with the addition of a casino resort at this location.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- A casino resort is an improper use of the Land Intensive Agricultural zoning for the parcel and is totally out of character with the local environment. The casino project will be replacing valuable vineyard with concrete and heavy commercial activity. The loss of valuable vineyard land in Sonoma County should not be allowed because this quality of land/ vineyard potential is limited to specific areas in Sonoma County. The vineyards are the foundation of the Sonoma County Wine Country tourism business. The loss of scenic vistas and loss of aesthetic quality in this area should not be allowed. This is one of those special vineyard locations. To replace this land with an estimated 10,000 to 20,000 visitors a day, plus employees, vendors, delivery drivers, should not be allowed. Please study the impact of loss of valuable vineyard/ agricultural land on the residents and visitors who come to this area to see vineyards and open space and enjoy the special character of Shiloh Regional Park.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino sight will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and the public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes

located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels, and degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on the local area and on downstream water flows.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months every year, and for slightly shorter times during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current level of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact the stress and welfare of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from points all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on the west-facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH. Please study the impact of loss of venue along Faught and Shiloh Roads for these athletic and outdoor events on the local small businesses.

Loss of Open Space- The proposed casino site is on open space/ vineyard land with a Riparian Corridor that is designated as protected habitat for the Valley Oaks and for wildlife. Please study the impact of the casino project's long term continuous day and night operation on the animal and plant habitat in the surrounding neighborhoods, Esposti Park and Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. Please study the impact of continuous noise, sirens, alarms at all hours on the residents' many pets and their mental health and stress levels, which will certainly exacerbate the elevated stress levels of the neighborhood residents.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks. Please study the number of activities that have been organized at Esposti Park and at Shiloh Regional Park in the last 10 years.

No significant connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - Please study the noise from increased traffic during construction and after completion – please study the expected noise from construction and for how many years before the structure would be completed; please study the noise from entertainment at casino resort, both indoors and outside, and at special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day and night operation of the proposed casino project. Please study what the impact the noise levels during day and night operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of a gambling casino bringing tens of thousands of visitors to the area on the existing quality of peaceful and quiet enjoyment of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and each year for the last 10 years. Please study the number of people using Shiloh Road between Esposti Park and Shiloh Regional Park as a main route for daily exercise and activity for the past 10 years.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location. Please identify the small businesses adjacent to the parcel and describe the businesses and their activity, the number of employees, their hours of operation, and their direct impact on the surrounding residents; please identify the residential areas and the number of residents along Old Redwood Highway from Shiloh Road to Airport Blvd, and along Shiloh Road to Fulton to Airport Blvd. Please identify the many residential areas that surround the Shiloh parcel, how many homes and apartments exist, and how many residents live here.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road - please study impaired evacuation during wildfire emergency; impaired emergency response when traffic is gridlocked – ambulance, fire, police, sheriff, CHP, and please study the increase in noise causing sleep disturbance, stress, and harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and traffic slowdowns and stoppage occurs daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was heavily congested because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic. Please study the increase in emission toxins due to idling vehicles on the highways and roads for hours.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by all

residents in the surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will go dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells. During times of water restriction, how will water use by the casino resort be regulated and monitored so that the surrounding communities are not adversely impacted by their water use?

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting in the recent past and expected management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project

across the street from Esposti Park. Instead of having more space for the fire to be contained, will fire fighters will have to choose to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well as little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of these significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain will cause consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, will cause consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural vista to Shiloh Regional Park and the Mayacama foothills, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

From: Joseph Syufy

Sent: Tuesday, June 21, 2022 2:45 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Natio Shiloh Resort and Casino Project, att. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. I am a local resident and live within a half mile of the project. The Comment period for this project is far too short and does not provide enough time and public input. Thirty days of review for a Federal project of this size and scope does not meaningfully allow for a full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process. My specific areas of concern are shared by literally everyone in the Town of Windsor, the County of Sonoma and all the residential communities within five miles of this proposed Resort Casino. Below are my concerns:

Aesthetics – Visitors come to Sonoma County for the aesthetics of this area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate the same aesthetics. This project destroys the beauty of the region, building a gambling casino resort, with buildings, parking lots and structures, artificial light, traffic and congestion and crime, inside a residential area. There are commercial areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location – Please study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas

specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair emergency response; please study how the increase in traffic will add to the duration of gridlock as well.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability

of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increased drunk/intoxicated drivers in a residential family neighborhood/community; please study the incidence of DUI during daytime hours and evening to morning hours; please evaluate the number of residents at risk who work normal daytime hours, evening and night shift hours; please evaluate the number of school children going to/ returning from the nearby schools; please study the number of nearby schools that have events at Esposti Park and Shiloh Regional Park and the risk to their public safety and health with a casino resort across the street.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland - urban interface, the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger.

Fire Danger and loss of vineyards/ loss of green belt space Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard. The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire by narrowing the wildfire-urban interface at this location. This casino would decrease the defensible space for the adjacent residential neighborhoods. Fire Season is year-round and increasing – Please study the number of days of unhealthy air quality (NOAA) from 2017 to the present due to wildfire smoke in Sonoma County. Please study the number of days annually when the public is advised to stay indoors and/or is cautioned about working or exercising outdoors due to wildfire smoke. Please study how smoke and poor air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the

decrease in visitors to the “Hwy 101 corridor of casinos” will be on a 4th casino resort’s revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for the infrastructure to support; it is not compatible with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, on the level and quality of groundwater, and on the public safety and welfare of the community. Please investigate the accuracy of the description of the Project location. The Koi presentation is misleading and falsely shows a minimized casino resort profile suggesting a rural and isolated location. This is completely FALSE. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, Koi plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated inside the boundaries of a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution, and the welfare of the residents subjected to 24 hours a day to noise from cars and trucks’ sirens, alarms, visitors’ car radio music, and the sirens from emergency response vehicles. Please study the number of police/sheriff and emergency vehicle responses to Graton Rancheria since 2014, and estimate the expected number of emergency response vehicles that will be called to the Shiloh location – how loud are the sirens on these vehicles ? How much harm to the mental health and sleep health of the residents in the nearby residential neighborhoods, and the visitors to Esposti and Shiloh Regional Park? How far will the siren noises carry? How many residents in this area will be adversely impacted by the increase in siren noise? Please also study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents’ homes.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

No significant connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The

Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting in the recent past and expected management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, will fire fighters will have to choose to protect the neighborhood or the casino?

Impact of Ignoring Zoning Restrictions – Please study the impact of these significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor’s Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each

residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain will cause consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, will cause consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural vista to Shiloh Regional Park and the Mayacama foothills, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Sincerely,

Joseph Syufy
4400 Shiloh Ridge Rd
Santa Rosa, Ca

Tom Thornsley
tomthornsley@msn.com

June 21, 2022

To: tribalaffairs@sonoma-county.org & chad.broussard@bia.gov

Subject: "Koi Nation Shiloh Resort and Casino Project", Notice of Preparation of an Environmental Assessment / Tribal Environmental Impact Report

To Whom it may concern:

I have been made aware of the desire for the Koi Nation to establish resort and casino on the southeast corner of Shiloh Drive and Old Redwood Highway just outside of the of Windsor. The idea of a casino in this rural area possess a lot of questions regarding likely impacts it could have on the environment and the quality of life for those currently enjoying their peaceful lifestyle away for intense urban development. The NOP provide insufficient detail about the extent of the project and there are numerous issues to consider in the preparation of you environmental documents. Although the Proposed Project includes the development of a casino, hotel, conference/event center, restaurant/bars, and supporting parking and infrastructure within the project site, it fail to provide the building square footages, capacities, operational hours, event scheduling. All of these missing elements are necessary to know in order to provide detailed comments about likely impacts. Because of these shortcomings, the NOP must be recirculated with the project details well defined.

In the NOP it states the following:

"To reduce paperwork and eliminate redundancy, the TEIR will be prepared in coordination with the Environmental Assessment EA, resulting in a joint "EA/TEIR" (herein referred to as an "EA"). Thus, this notice is also intended to fulfill the anticipated requirements of the Tribal-State Compact to provide interested parties with information describing the Proposed Project and its 2 of 8 potential significant effects and the opportunity to provide comments related to the scope and alternatives to be addressed within the environmental document. Information is available online at shilohresortenvironmental.com."

The level of detailed information about the project can only give someone a limited idea of the potential extent of impacts associated with this project. The 2 potential significant effects are not outrightly defined thus no way to know what they may entail. Alternatives are not discussed in the NOP thus it is expected that during the review period of the EA/TEIR the public will be permitted to provide comments and suggested mitigation measures prior to approval.

Without detailed knowledge of the Project's full intent, one can only speculate on what must be considered in preparation of your environmental document. Below are the speculative ranges of things I believe need to be addressed.

1. Size of the Casino (square feet/gaming machines & tables)
2. Size of the hotel/resort (room count)
3. Number of restaurants (seating capacity)
4. Expected number of employees
5. Size of the conference facilities (capacity)
6. Size and capacity of the event center
7. Expected activity level of the event center monthly
8. Operating hours for all facilities
9. Height/stories for all facilities
10. How will you minimize the visual impact of any buildings over 3-stories?
11. All light standards must be low profile – not taller than 25 feet.
12. All lighting must be shielded and in the lower wave lengths to limit light scatter and maintain a “Dark Skies” environment as expected in this rural area.
13. Number of parking spaces and how they are calculated
14. Parking lots shall be provided with sufficient tree planting to shade the asphalt/parking stall to avoid creating of a heat sink on site.
15. How will the operators of the Project deal with undesired “off-site” parking during heavy activity? This concerns street parking and parking at the public park nextdoor.
16. Quantity of land subject to development and disposition of the remaining vineyard
17. Extent of adjacent and off-site roadway improvements necessary to accommodate the project
18. Defined the extent of traffic impacts beyond the project site
19. Defined percentage of impacts to roadway/intersections off-site and how those improvements will be made.
20. Mitigate all associated infrastructure impacts beyond the project site affecting the Town of Windsor and Sonoma County.
21. The project will likely impact the single stop intersection of Fulton Road at Old Redwood Highway and the Highway 101 / Shiloh interchange and they must be improved meet associated project traffic impacts.
22. Expect to see Development Agreements with the Town of Windsor and Sonoma County for an appropriate level of annual financial compensation to offset community and infrastructure impacts comparable to sales and property tax collected to pay for these items?
23. Who will provide fire and police services to the project and how are they compensated?
24. How will you deal with traffic impact should there be special events?
25. Excessive traffic into the area generates more air pollution/greenhouse gases – how will they be mitigated?
26. How will you deal with water run-off from all the improved impervious surfaces? Don't believe there is a storm drain system in the area to handle overflow of any retention basins. How will overflow be addressed?

27. What will be put in place to prevent runoff spillage into Pruitt Creek?
28. Why can't the vineyard be used as a Koi Nation business and livelihood? This is a viable alternative.
29. Please provide a map of the Koi Nation's ancestral lands.
30. Provide the population of the Koi Nation's people.
31. Where do they commonly reside at this time?
32. Outline who qualifies as a member and how a member's heritage is proven.
33. How will the Project's operations comply with State and local recycling requirements?
34. Will this be a smoke free facility?
35. Will there be an opportunity to comment when EA/TEIR is released?

As previously mentioned, it is hard to offer more precise comments with knowing the complete project details. It is expected that there will be an opportunity for a formal review of the final proposed project, the list of alternatives, and the full environmental assessment to which more precise comments can be provided and considered. Should you have any comments feel free to contact me via email.

Sincerely,

A handwritten signature in black ink that reads "Tom Thornsley". The signature is written in a cursive, flowing style.

Tom Thornsley
tomthornsley@msn.com

To: Director Dutschke, BIA

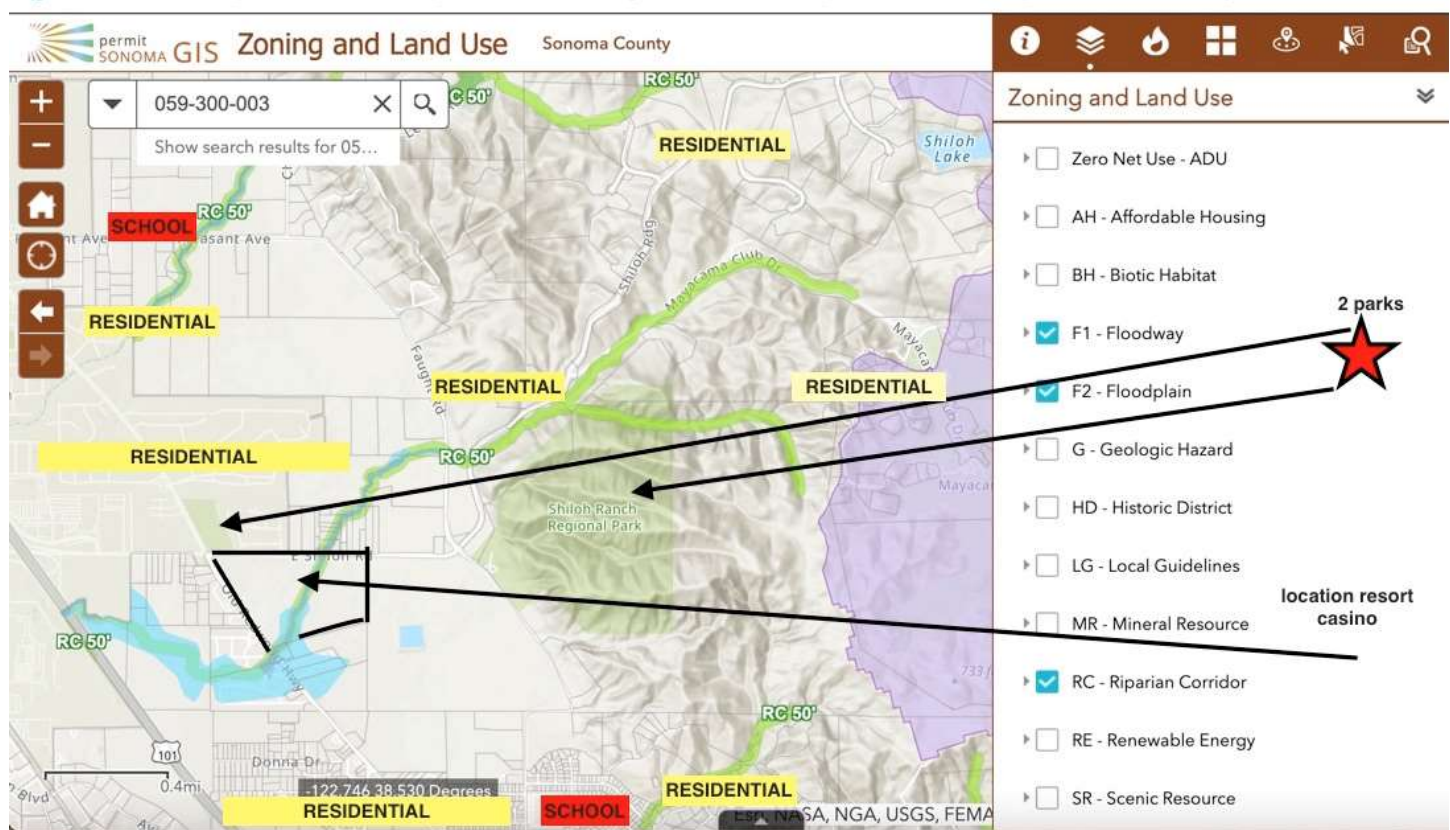
Re: Koi Nation Shiloh Resort and Casino project

Impacts on All the Neighborhood Communities Surrounding project location

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

First, I request the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant Federal action, with a comment period that opens on the Friday before a Federal holiday, and includes a second Federal holiday, does not allow for full public review. This proposal will significantly affect the residents living next to and near the project and the quality of the environment, and it should undergo a full EIS analysis with enough time for the public to participate at each stage of the process.



Please study the impacts on the surrounding residential neighborhoods from THE ONLY RESORT CASINO IN NO. CALIF to be BUILT IN THE MIDDLE OF EXISTING RESIDENTIAL NEIGHBORHOODS. Impacts will need to be studied for the next many generations of Sonoma County residents because this is an inclusive family-oriented County.

Please study how many residents living in Windsor and Santa Rosa in the residential areas east of Hwy 101, will be impacted by traffic/ noise/ light pollution/ loss of scenic aesthetics/ inflow of tens of thousands of visitors daily into area causing increases in crime and in drunk/ intoxicated driving accidents. Please study/identify how many residential neighborhoods are located east of Hwy 101 from Windsor to Santa Rosa city limits, and include Fulton/ River Road/ Slusser Road area as well.

Please study how many families live in these neighborhoods, how many students attend all the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield; please include all schools, public, charter, independent, private, and homeschools. Please study the location of all these schools and their relation to the Shiloh parcel, considering distance and transit routes. Please study the demographics of Sonoma County from the 1980s to the present to know how many people have moved to Sonoma County to raise families. Please study the increase in school enrollment in all the neighborhood schools during this time, in Windsor and NE Santa Rosa.

Old Redwood Highway is the main transit route that connects these communities from Windsor to the city limits of Santa Rosa. This area is rural/ suburban comprised of homes, townhouses, apartments, trailer parks, low-income housing, parks, schools, and very small businesses in designated approved areas. Please evaluate the traffic studies and transit routes in this area and evaluate the impact of building and operating a resort casino 24/7 on the existing traffic conditions, and on residential neighborhood activities such exercise and recreation, dog walking, families with small children, walking, running and cycling on Shiloh Road from Esposti Park to Shiloh Regional Park, quality of sleep and onset of sleep disorders due to noise from all casino resort activities 24/7.

Shiloh Road East is the main road from Hembree Lane to Faught Road for visitors to Esposti Park and Shiloh Regional Park and for residents' homes in neighborhoods along Shiloh Road and Faught.

Please study the impact during construction and for the next 50 years on these neighborhoods and roadways, because the size and 24/7 operations of a resort casino at this location will dominate the landscape and residential life activities, overwhelm the resources of public services, of Esposti Park and Shiloh Regional Park, and impact all the communities on the EAST SIDE of Hwy 101 from Windsor to Santa Rosa City limits for generations.

This flat parcel is located on two of the busiest streets in the area and is fully visible from every side, and from Esposti Park and Shiloh Regional Park as well. Please study the impact of a resort casino operating 24/7, with multiple highrise buildings equal or greater in size to Graton Rancheria Resort Casino compacted on a parcel of only 68 acres on the landscape here, where **there are no highrise buildings on the east side of ORH**, an area which has been regulated by zoning restrictions to preserve the scenic qualities of Sonoma County Wine Country that attract tourists and visitors to this area for special events and park activities. All the other properties surrounding this parcel MUST comply with the Sonoma County zoning restrictions, no exceptions.

Please study the history of the Sonoma County General Plan and how development in this area has been regulated for the benefit of all Sonoma County residents. Please study how commercial-zone areas have been designed in a cooperative way with residential neighborhoods, schools, parks, and churches. Please study the provision for greenbelt open space by the Town of Windsor and Sonoma County; and study the value of the vineyard's location in the Chalk Hill American Viticultural Area.

Impact of Eliminating Zoning Restrictions – Please study the significant zoning restrictions on this parcel and the impact of ignoring them. Please study the reason why these zoning restrictions are attached to this parcel - the unique physical characteristics of this parcel and its location relative to the surrounding parcels. Please address each zoning restriction in detail and please study what impact ignoring each one will have on the environmental health of the area and the well-being of the residents.

Parcel Zoning restrictions: LIA, B6 20, F1 F2 RC50/25 SR VOH

Please study the zoning regulations for this parcel and how the 24/7 operations of a casino resort on this parcel will cause many conflicts between the surrounding residential neighborhoods that have been developed in compliance with the zoning restrictions.

Please acknowledge that the zoning for this parcel does not include commercial of any size and that the NOP statement by the Koi Nation regarding this is not accurate.

Zoning restrictions are important because **all** of the surrounding property owners must comply with their zoning restrictions; a resort casino “island” that does not comply in the same way will establish conflicts of interest at every point of interaction with its neighbors, to the detriment of the residents and the environment.

Please study the many **points of conflict** between residential neighborhoods, parks, schools, and churches and a large casino resort operating 24 hours a day, 7 days a week. Points of conflict: traffic, noise, influx of tens of thousands of visitors for gambling into a residential area, response of emergency services to residential areas, crime, motor vehicle accidents due to intoxicated driving, gridlocked evacuation routes during wildfire events, interference with park activities, water use.

LIA - this parcel has high value for vineyard producing premium wine grapes in the **Chalk Hill AVA**. It is premium agricultural land based on its geologic characteristics and location in the Chalk Hill AVA, established in 1982. The Chalk Hill AVA has limited vineyard locations within its boundaries, as shown on the map below.

Please study the limited area for vineyard land within this boundary (see map); please note that the Chalk Hill AVA includes only about 1200 acres, most lying at the foot of the Mayacama range, where the “white” volcanic soil is located. Please evaluate the history of this region dating to the 1850’s, specifically recognized for its value for agriculture and growing wine grapes. This land has very special geologic and geographic characteristics that make it uniquely valuable for agriculture, specifically wine grapes which bring significant revenue for chardonnay and pinot noir in today’s market. Please study the TTB-AVA records documenting the special characteristics of Chalk Hill AVA and evaluate the value of this land as agriculture compared to destroying it by building a resort casino.

Please study how building a resort casino here will forever destroy this land for agriculture. Please study the environmental impacts of building a resort casino that will fail financially – what next?

...and cooler than Alexander Valley and Dry Creek Valley.

Soils. The proposed Sonoma Chalk Hill Viticultural Area is also distinguished by what is known as "white" soil. Although the Area contains soils ranging from sandy to silt loam, clay and quartzite, most all of these soils are high in volcanic ash ("white" soil). The ash, along with other volcanic debris, was deposited in the Area during the eruptions which formed Mount St. Helena. The uniqueness of the soil is very apparent. Even when moisture is adequate to sustain growth the soils appear to be dry. Vineyards in the proposed Area are on generally deep soils, but ones which are lower in fertility. This contributes to the high quality of their fruit. The vines at full maturity are not large and their yields are low compared with yields in the surrounding valleys where mature vines planted on deeper and much richer soils are larger and more vigorous. Yields of two to three tons of grapes per acre are common in the proposed Area and yields in excess of four tons per acre are rare.

CHALK HILL AVA is significant for its "white" volcanic soil.

The area contained within the boundaries of the proposed Viticultural Area is known locally as the Chalk Hill area. It derives its name from a hill of the same name. The soils of the hills, table-lands and bench-lands sloping to the southwest, south and southeast from the summit of Chalk Hill contain the so-called "white" soils which were created by volcanic debris. The history of the area follows closely the history of Sonoma County. There are currently more than 1,000 acres of producing vineyards and two producing wineries in the proposed Area. New vineyard plantings continue. Approximately 2,000 acres of grapes would be added if the old non-producing vineyards were re-planted and there is additional acreage which is suitable for grapes.

A more detailed statement regarding the proposed Sonoma Chalk Hill Viticultural Area is contained in the historical report by Wine Historian William Heintz, attached hereto as EXHIBIT "A".

Section 4.25a(3)(2)(ii) Historical or Current Evidence.
Please refer to the report by Mr. Heintz, marked EXHIBIT "A", which is by reference incorporated herein and made a part hereof.

Section 4.25a(e)(2)(iii) Geographical Features. A valley is defined as low land lying between hills or mountains. Geologists and surveyors consider a valley to be formed by the various strata of lands which are drained by a river system.

source: TTB, AVA, Alcohol & Tobacco Tax and Trade Bureau, Federal Alcohol Admin. Act

PLEASE study the map below and find the limited number of vineyards in the Chalk Hill AVA, estimated at only 1200 acres, of which this 68 acre parcel is a part, **6%** of total Chalk Hill AVA acres.

Please study the relative value, for future generations of Sonoma County residents, of the parcel as vineyard vs. a commercial business which should be located in areas suitable for commercial use, where the land has no inherent unique and specially recognized agricultural or viticultural value.

Please study the differences between commercial areas that operate normal business hours and a resort casino and entertainment center that operates 24/7, and the impact on any adjacent businesses or nearby residential areas. Please study the need for an entertainment center when the Luther Burbank Center is located 5 minutes away on Old Redwood Highway.

Please identify the impacts unique to a resort casino that operates 24/7 - the noise, traffic, night lights, risk to public safety, influx of tens of thousands of visitors, crime, and intoxicated driving 24/7.



Please note the limited number of acres of vineyard in the Chalk Hill AVA, a Federally recognized area.

Financial viability and The Future of online gaming – Please study the financial viability of a mega-size resort casino when the future of gambling will be online, with no need to travel to a casino. Please consider the impact of destroying valuable agricultural land for a resort casino that may fail because online gambling will discourage visits to casinos and adversely impact future financial viability. Please study the financial viability of the Koi Nation Resort and Casino when the 5 true local Tribes oppose this project because there is not adequate interest to support an additional casino 15 minutes away from Graton Rancheria Resort Casino. Please study the Sonoma County Tourism data on the decline in visits during wildfire season, number of days of poor air quality requiring public health warnings for outdoor activities, during PGE power outages for high wildfire risk/ high wind warnings since 2017.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Commercial Use:

Please study the differences between commercial areas that operate normal business hours and a resort casino and entertainment center that operates 24/7, and the impact on any adjacent businesses or nearby residential areas - the noise, traffic, night lights, risk to public safety, influx of tens of thousands of visitors, crime, and intoxicated driving 24/7.

Please study the need for an entertainment center when the Luther Burbank Center is located 5 minutes away on Old Redwood Highway.

The **B6 20** restriction recognizes the need for housing on property and allows for a split into 20 acre parcels with limited footprints for building, in order to preserve the special agricultural value of this land. Please study the long term, 50 to 100 year impact of destroying these acres and losing valuable agricultural land which cannot be substituted or replaced. Please study the long term impact of destroying agricultural land anywhere in Sonoma County when there are other locations suitable for commercial buildings and operations. Please study the importance of this land with its unique soils and location in the Chalk Hill AVA for future generations; please evaluate the detriment to these future generations who will have lost forever its agricultural and viticultural value, its green space/ open space value, and its scenic vista qualities.

The map shows the many surrounding neighborhoods that surround the proposed resort casino location. Please study the visual and sensory impacts of a casino resort at this location on the surrounding communities for the next 50 years.

This parcel is zoned for 20-acre minimums for each residence, allowing only 3 single family residences on a 68-acre parcel. A resort casino will add tens of thousands of visitors a day to a parcel zoned for 3 separate residences. Please study the impacts of ignoring this density restriction on the adjacent property values, on residential quality of life, on the environment, and on the scenic aesthetics.

The **SR scenic resources** restrictions "Require development within community separators to be clustered and limited in scale and intensity." The purpose of a Scenic Resource restriction is to preserve the visual character and scenic resources of lands in the County.... and implement open space elements."

It is the intention of the Sonoma County General Plan and the Town of Windsor's Greenbelt to preserve this valuable agricultural land in Sonoma County. The vineyards and open space, with far-reaching vistas to the adjacent hills both west and east, and with "country roads" that cyclists and tourists drive to see the beautiful agricultural area – these are the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. This site is visible from vista points all along Fulton Road coming from the west, along Hwy 101, along Old Redwood Highway, along Shiloh Road.

Please study what impact loss of these 68 acres to a commercial operation will have on this scenic resource/ open space/ **Greenbelt that was specifically planned** to maintain open space for wildfire defense and scenic vistas around the residential neighborhoods. This Green Belt area also provides high aesthetic value and increases the property values of all the adjacent areas. Please study how the visual impact of a massive commercial resort casino is not consistent with the Scenic Resources

restrictions, so specified for the beneficial use of all Sonoma County residents and for the enjoyment of tourists who come to Sonoma County for the natural beauty of the vineyards, farms, open space, rural aesthetics, and the Russian River.

Please study how loss of these 68 acres will reduce the amount of open space and defensible space, and will bring the wildfire/urban interface closer together thereby increasing the wildfire risk to the neighborhoods. Please study the impact of losing this space on the Fire Department/Cal Fire's ability to protect the adjacent neighborhoods, and what will be the impact on CalFire and the local Fire Departments. Please study how CalFire and the local Fire Departments will decide who to protect when the next wildfire burns in this area and if there are adequate resources to protect a resort casino surrounded by residential communities. (refer to maps in this email)

Please study **the increase in property insurance** for these surrounding neighborhoods if the casino resort is allowed and adequate resources to protect both the existing neighborhoods and a resort casino do not exist.

F1 F2: Please study the impact of loss of 68 acres of **Flood Plain** with consequent loss of water for recharging the aquifers, groundwater, and wells.

RC 50/25 VOH: Please study the impact of a resort casino on the Riparian corridor, and the Valley Oak Habitat, that transects the parcel, on the wildlife habitat here and wildlife displacement away from this area due to the noise, night lights and increased population of humans in this area. Please study the impact on rodent predators and consequent increase in the rodent population, especially with the influx of casino visitors and garbage. Please study the protections of the Riparian Corridor from encroaching development 50/25 feet from the corridor and enforcement of these protections.

Riparian Corridor - PRUITT Creek water supply and quality

Please study the impact of the resort casino on Pruitt Creek that flows from the Mayacama foothills through Shiloh Park, enters the parcel on the Shiloh Road side, transects the property to the flood plain on the parcel, and exits into Windsor's Pool Creek. Please study the impact of loss of these acres on the recharging of groundwater in the area, and the downstream uses of Pruitt Creek by Sonoma County and the Town of Windsor residents. How will use of these waters by the Town/ County/State be protected? How will use of these waters be protected in the Riparian Corridor on the parcel? Will the water use by the casino resort be restricted to protect the groundwater and downstream uses? Please study how casino resort will impact the volume and water quality of these waters, and the downstream uses of this water that flows into Pool Creek and further into the Russian River.

Please contact the North Coast Water Quality Control Board regarding Pruitt Creek which flows diagonally across this parcel. Maps of the Windsor Watershed are below. Please study/ identify the protections for Pruitt Creek. There is no riparian water right on this parcel and the waters that flow from the two sources cannot be diverted or interrupted or contaminated. Please contact NCWQCB about this parcel, the zoning RC 25/50, and identify the protections of these waters. Please contact Calif. Dept Fish and Game about restrictions for development around this Blue-Line stream in addition to the Riparian Corridor restrictions on development. Please study the impact of the building and operation of a resort casino that has no regard for the restrictions on the water passing through this parcel as it flows to Pool Creek and on to Windsor Creek and eventually to the Russian River with in place.



Pruitt Creek is a designated Blue-Line Creek with protections, a part of the Windsor Creek Watershed (Town of Windsor). Please study the impact of any disruption of water supply from Pruitt creek on the Town of Windsor's water supply, including groundwater, aquifers and wells.

Please study water use by a sovereign of any water flowing in this Creek, and how the water flowing onto tribal land will be regulated and monitored. Will any water flowing onto tribal land be permitted to be collected and stored for use by the resort casino, to the detriment of downstream beneficial use?

MAP OF BLUE-LINE CREEKS IN WINDSOR AND MAYACAMA FOOTHILLS



Please study the upstream and downstream impacts of building a resort casino in the middle of Pruitt Creek. (LIGHT BLUE SQUARE). This map shows the protected streams and creeks.

Please study the history of Pruitt Creek for the past 40 years to better understand the impact of a resort casino on this parcel. The Creek divides the property into two pieces, almost equal in size.

Map of Koi Nation parcel showing blue-line Pruitt Creek crossing from Shiloh Road to exit on adjoining property on Old Redwood Highway. The adjacent residential neighborhoods are in white.

(NEXT PAGE)



"Sonoma County Permit Sonoma.org Waterway Setback Requirements for Riparian Corridor zoning (RC).

"The County of Sonoma has established various types of setbacks from different types of waterways **in order to protect life, property, and the environment**. Setbacks from waterways are also necessary to account for the natural meandering of streams and to provide sufficient maintenance access between property and streams. This document summarizes waterway setback information from assorted sections of the Sonoma County Code (SCC). When multiple setbacks apply to a waterway, the most protective setback shall generally govern land use development." **Designated Stream** : includes all streams shown on the General Plan Open Space maps. These streams are commonly referred to as **"blue-line streams"**. The Riparian Corridor (RC) zone is applied to all designated streams and adjacent streamside conservation areas."

Designated Stream (Pruitt Creek) crossing the Shiloh parcel – This water originates in the Mayacama range and exits into the Town of Windsor Pool Creek. Please study the designated "blue line" Creek that transects the entire property diagonally from Shiloh Road to Old Redwood Highway and the County's and State's protections of this Creek, water flow history for the prior twenty years, and the lack of riparian water rights by owners of the parcel. Please study the restrictions on development along the Creek and how this resort casino's impact on the Creek will be monitored and regulated.

Please study permitted water use by a sovereign of any water flowing in this Creek, and how the water flowing onto tribal land will be regulated and monitored. Will any water flowing onto tribal land be permitted to be collected and stored for use by the resort casino, to the detriment of downstream beneficial use?

Flood Plain, Ground Water, Well water supply and quality

This parcel is a Flood Plain. Please study how monitoring of the disposal of toxic wastes during construction and after during operation of the resort casino will be done. How will the Riparian corridor and water that flows into the creek and flood plain on the parcel be protected from toxins during construction and after completion? How will the monitoring of water flow onto the property be done, and how often during rain events will the creek water and surface waters be monitored to protect downstream flows, ground water and well water quality?

How many wells are in the adjacent area and what will be the impact on these from water usage by the resort casino?

Please study the water use requirement of a resort casino of this size for all uses.

Please study the wastewater discharge volumes for a casino resort of this size and the impact on groundwater and well water quality.

Please study the total well water use for its construction and its operational periods, estimating for the next 5 years with the current drought conditions. How will the well usage on the parcel affect the current existing wells' supply and water quality? Please study the historic well water use and supply in this area for the past 10 years and estimate what will be the impact of a casino resort's well water use be on these existing wells and on the water table. Please study the downstream impacts during construction and after completion for the next 10 years, estimating for the worst-case and best-case scenarios.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a resort casino and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by all residents in the surrounding communities. Investigate how many wells have already been redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will go dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells. During times of water restriction, how will water use by the casino resort be regulated and monitored so that the surrounding communities are not adversely impacted by their water use?

Loss of Scenic Resources – please study the impact of the casino resort's hotel, parking garages, casino, towers, entertainment center, in a flat area where there are no other highrise buildings. How tall will these be? Please study the impact on scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park, from Faught Road, along Shiloh Road.

Please study the detrimental impact on visitors to Esposti Park and Shiloh Regional Park , and anyone using the roads for cycling, walking/running exercise. Please study the impact of the location, size, height, and number of the resort casino buildings on the east side of ORH. Please compare the impact of buildings on the east side of ORH vs. the west side of ORH. Please compare the impact of each of the resort casino buildings on loss of scenic quality from points along Hwy101, along Old Redwood Highway, Shiloh Road, Faught Road, and River Road, and from Esposti Park and the new residences being built across the street.

Please study the **evening - nighttime light** profile for the casino resort and the impact on the residential areas and parks immediately adjacent to the resort casino. Please study the orientation of the buildings and if the hotel windows will be visible to the surrounding residential neighborhoods. Also, please study how far away these night lights will be visible, from points over 6 miles away on the other side of the valley. Please study the impact of night light pollution on the wildlife habitat in the Riparian corridor and at both Esposti and Shiloh Parks.

Inappropriate Use for this parcel – This parcel is not appropriate for commercial use. This parcel is not zoned or appropriate for a large commercial gambling casino business operating 24 hours a day, 7 days a week. The zoning restrictions are designed to preserve the integrity of this environment.

Please study **the accumulative impacts** of loss of these zoning protections to the environment, adjacent surrounding residential neighborhoods, schools and parks. Koi Nation propose a resort casino and entertainment center that will be larger than Graton Rancheria Resort Casino but on a much smaller parcel of land that has no separation from the surrounding neighborhoods : please study the compounding of impacts of traffic and noise on the well-being of residents, increased risk to elementary school children in nearby schools, as well as on competition for emergency response services, detrimental interference with normal residential life activities; evaluate the loss of essential floodplain and flood path acreage, interference with waterflow in the Riparian Corridor, harmful impact to wildlife in the adjacent parks, detrimental impact on peaceful enjoyment of the two parks.

Please study where the commercial zoned areas are located, on the west side of Hwy 101 and why the Sonoma County General Plan made these decisions. Please study the zoning on the Graton Rancheria Casino parcel and the differences between that site and the Shiloh site. Please study the location of the residential neighborhoods, university, parks, and businesses on the east side of Hwy 101 in Rohnert Park, and the traffic flows to/from the Graton Casino on the WEST side of 101.

Please study how many visitors will be necessary for the Koi Resort and Casino to be financially viable for 40 years. Please study how many employees will be driving to/from work daily. And study how many tourist buses and vans, vendors and service providers will be driving to/from work daily. Please study the parking needed for all of these. Please study the vehicle noise from alarms, horns, sirens, doors locking and opening, engines starting and idling and all other noise related to increased casino traffic.

Please study the impact of locating a casino resort in the middle of residential communities on the incidence of vehicle accidents' injury and death: please study the incidence of accidents and death from intoxicated driving or distracted driving in the areas of the other 47 Northern California casinos and resorts where alcohol and cannabis are available 24 hours a day.

Please study how many commercial-zone areas are located in the Shiloh Road area, and determine their size, operating hours, number of employees, business activities, and customer visits and transit routes to these businesses. Please study the building size/ height and daytime and nighttime profiles of these businesses. Please study the zoning restrictions on all of the surrounding parcels located on the east side of Hwy 101, from East Windsor to the city limits of Santa Rosa, extending eastward from Larkfield to Mark West. Please study the impact of Walmart and Home Depot and the other small businesses immediately next to 101 on local traffic flows, and how the designed planning keeps the business traffic separate from the traffic going into the adjacent residential areas starting at the Hembree Lane/ Shiloh Road intersection.

Please study the impact of the 2017 Tubbs Fire and 2019 Kincade Fire on the businesses located on the east side of Hwy 101, from Windsor to Santa Rosa City limits. Please study the impact of a resort casino on the other businesses in this area – competition for similar goods, loss of business due to traffic congestion when customers avoid these areas for shopping because of traffic congestion. Study the impacts on all businesses during evacuations for wildfire, during prolonged power outages for high risk wildfire conditions, during prolonged dangerous air quality conditions from wildfire smoke and persistence of the smoke plume for many weeks during and after wildfire events.

Please study how loss of aesthetic quality will cause a long term **decline in property values** for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the resort casino and the noise caused by the increase in vehicle traffic (alarms, sirens, beeps, engines revving and idling, etc.) as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Noise = unwanted and harmful for public health:

noise from traffic – operations machinery – construction – entertainment – emergency/police sirens – car alarms/ beeps/ horns .

Please study the noise that will be generated by all the operating equipment needed for the casino resort – generators, the water treatment/ recycling equipment, garbage collection, HVAC, electric car charging stations and the charging of e-vehicles, water pumps, well pumps, and all other noise-generating equipment.

Noise from car sound systems and entertainment. Please study the noise that will be generated by entertainment both inside and outside. Please study the noise that will be generated by hotel occupants listening to music or TV or sports events in their rooms or in their cars as they are in transit to/from the resort casino; generated by entertainment events; generated by outdoor music or entertainment.

Noise from construction and traffic. Please study the noise from increased traffic during construction and after completion – please study the expected noise from construction and for how many years before the structure would be completed; please study the noise from entertainment at casino resort, both indoors and outside, and at special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health,

impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day and night operation of the proposed casino project. Please study what the impact the noise levels during day and night operation will have on local residents' health and the on health and behavior of residents' pets.

Public Safety

Please study the impact on the Police/ Sheriff/ emergency/ Fire Departments' staffing and engine/ vehicle responses with the addition of a resort casino at Shiloh to this area.

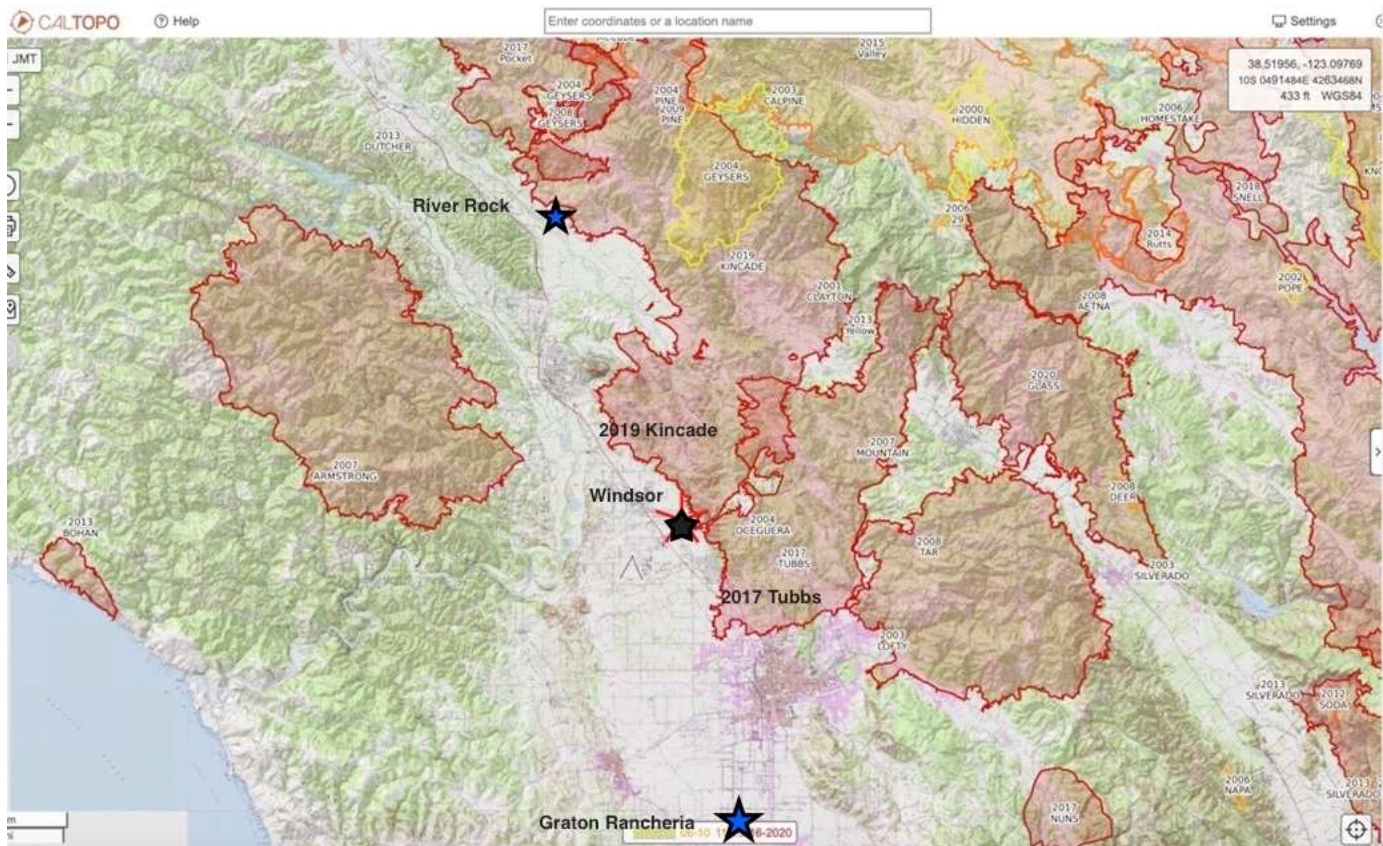
Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the resort casino and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Please study the impact of locating a resort casino in the middle of residential communities on the incidence of vehicle accidents' injury and death. Locating a resort casino within the boundaries of residential communities on shared transit roads increases the number of interactions of casino visitors and residents/ service personnel. Please study the incidence of accidents and death from intoxicated driving or distracted driving in the areas of the other 47 Northern California casinos and resorts where alcohol and cannabis are available 24 hours a day.

Please study increased risk to safety of the all the school students and teachers due to the large influx of visitor traffic to the area, proximity of these schools to the casino, and visibility of these schools located on the shared transit routes to the resort casino and other neighborhood locations.

Well-being- The casino project will be replacing 68 acres of beautiful vineyards. Residential neighborhoods, a large mobile home park, two churches and Esposti Park are directly across the street from the proposed casino project. Shiloh Regional Park is a 10 minute walk from Esposti Park. The east side of US 101 is a quiet mostly residential/agricultural area divided from an industrial/commercial area on the west side of US 101, a wide multi-laned freeway. Please compare the noise and traffic impacts from a casino resort with the other businesses in the area along Hwy 101 and on the west side; compare their profiles, traffic volumes, and operating hours.

WILDFIRE HISTORY AT THIS LOCATION



BLACK STAR = proposed location resort casino at Shiloh Rd. Two wildfires burned in the direction of this site, 2017 Tubbs and 2019 Kincade.

Two other massive fires (brown shading) burned the same areas: 1996 Porter Creek Fire and the 1964 Hanley Fire. The Porter and Hanley Fires were informative for developing the Green Belt open spaces shown in the map. Please study the Green Belt open spaces designated along the Mayacama foothills to protect the residential neighborhoods by the Town of Windsor and Sonoma County, and the impact of decreasing this space on public safety, aesthetics, and protection of property. Please study the impact on property insurance due to loss of this area of defensible space.

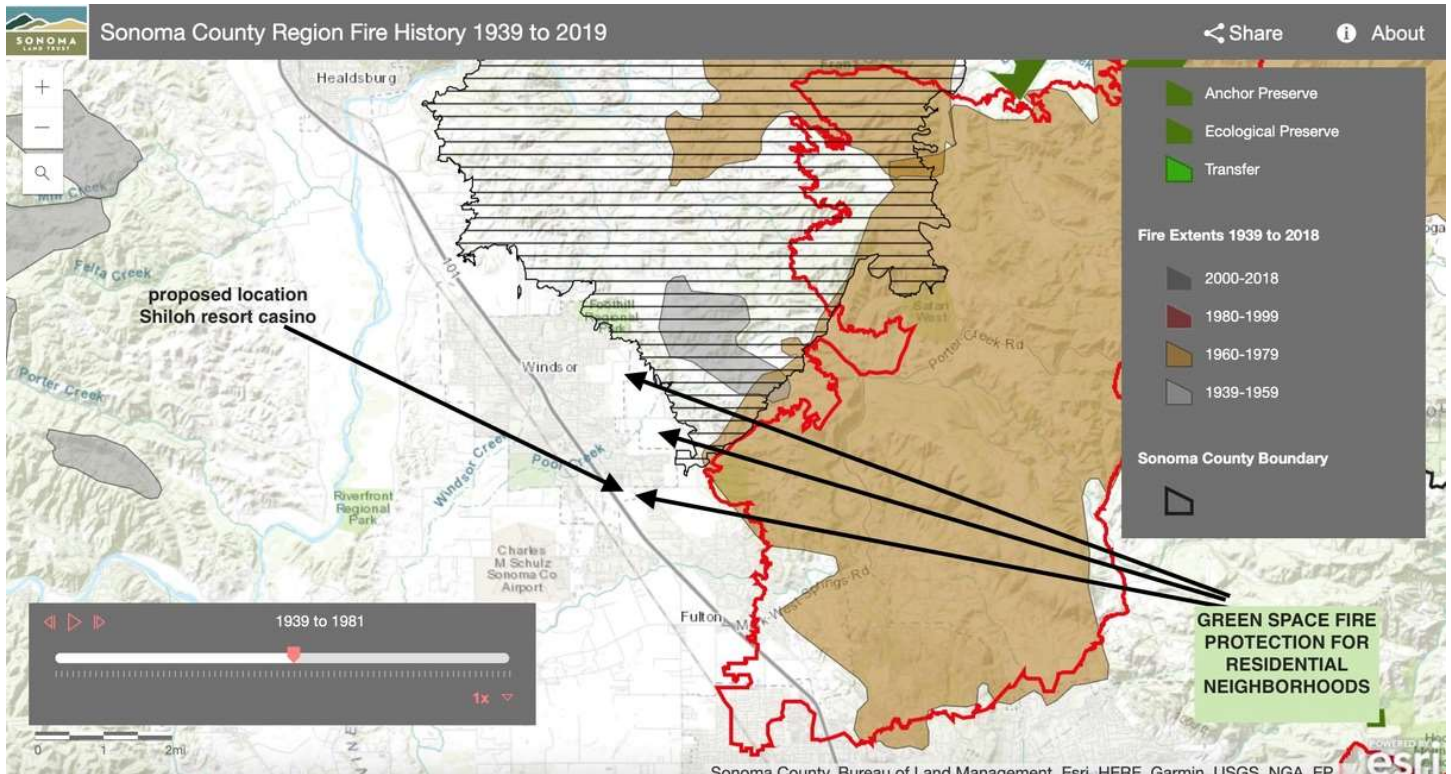
Wildfire Risk – Please study the impact of **loss of green belt / open space/ defensible space** at this interface of High Wildfire risk and residential neighborhoods.

What is the impact of losing these 68 acres of defensible space for the adjacent neighborhoods? Is there capacity for safe management for both the residents and the visitors/ employees at the casino, especially when evacuation routes are gridlocked and emergency response services are delayed or not available.

What is the impact on evacuation routes north/east/south of parcel. Evaluate the competition for limited supply of emergency response teams/ services for any adverse event due to increase in resort casino traffic to the area.

Please study the importance of maintaining this defensible open space for the surrounding neighborhoods.

Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel when the next wildfire burns in these same areas. Please study the evacuation that occurred in each fire and the speed of the wildfire spread for each; what is the potential for harm and loss of life for the casino visitors and employees.



Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincadee Fire 2019 – please study the management of wildfire fighting in the recent past and expected management of the resort casino visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the impact of limited fire protection services for the surrounding neighborhoods that would compete with a resort casino for fire protection - Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more defensible space for the fire to be contained, will fire fighters will have to choose to protect the neighborhood or the casino? Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel.

Youth Sport Leagues/ Park visits - Please study the number of visits by individuals and groups to Esposti Park in the past 10 years. Study the impact of a resort casino across the street from Esposti Park on the youth league tryouts for football and soccer, for Little League, softball, and soccer team practices and regular season games; on parking and foot traffic which often overflow onto adjacent

roadways. Esposti Park is used by many cycling clubs as their home base. Please study the impact of increased traffic from the casino project on park use, safety to children and park users, and impact on available parking caused by any road changes and increased traffic. Please study how parking will be regulated to maintain adequate parking for the park and local area, and not for the resort casino. Please study the increased risk in crime for users of Esposti and Shiloh Regional Parks – auto theft, robbery, gun violence, illegal drug activity. Please study the visitor use volume for Shiloh Regional Park for the past 10 years by schools, groups, hikers, walkers, and horse owners; what is the user volume of the picnic area which will look directly at a resort casino.

Residential Neighborhoods – Existing residential neighborhoods are less than 50 feet from this proposed site. Please study the impact of a massive increase in visitor traffic and the associated increases in crime (break-ins/ theft/ drugs and prostitution) directly into existing family neighborhoods based on data from other areas adjacent to resort casinos. Please study the impact on property values and quality of life in areas where casinos directly interface with residential properties.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing due to lack of staffing. This project proposes to need 1100 employees. Please study the impact of this project on local businesses' employment.

PLEASE STUDY THE IMPACTS OF INCREASED TRAFFIC on all routes intersecting with Old Redwood Highway and Shiloh Road: from East Windsor to Pleasant Ave, Faught Road, Hembree Road, Airport Bl, Fulton Road, River Road, Mark West Road, and Slusser Road connecting Windsor to River Road, and identify all the residential neighborhoods that are connected to these routes. Please identify the routes used by the neighborhoods to drive children to/from their schools. Please study the impact on the public transit services that use Old Redwood Highway from Windsor to Santa Rosa , and the transit times and incidence of prolonged transit time due to congestion and gridlock. Please evaluate the costs, immediate and long-term, of road repairs that will be needed for the increased degradation of the roads, and the impact of these repairs on traffic flow.

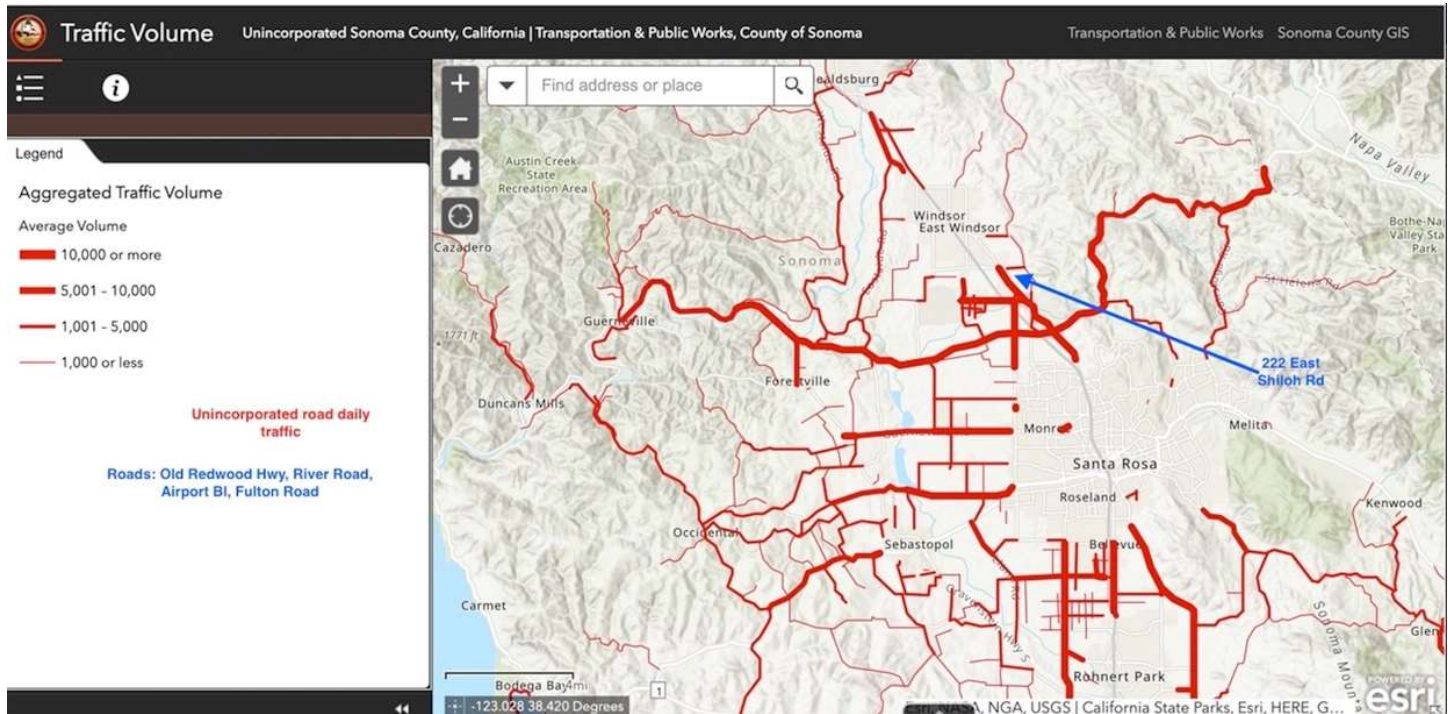
Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road when there is an accident on Hwy 101. Please study the incidence of Hwy 101 accidents during the past 10 years and impact on alternate route traffic patterns, volume, and increased driving times. Please study impaired evacuation during wildfire emergencies, impaired emergency responses when traffic is gridlocked – ambulance, Fire, police, sheriff, CHP.

US Highway 101 impact- During emergency evacuations in 2017 and 2019 traffic on US 101 was heavily congested and gridlocked. Please study the impact on Hwy 101 by the planned resort casino during and after construction (guests, employees, vendors, etc.) daily and in the event of an

emergency evacuation. Please study the impact on surrounding road infrastructure due to significant increases in traffic. Please study the increase in emission toxins and gas consumption due to idling vehicles on the highways.

Please study the map of current traffic volumes of over 10,000 daily vehicles in the area, and the detrimental impact of directing tens of thousands more daily visitors into the residential areas EAST of Hwy 101 at Shiloh Road/ Old Redwood Highway and extending to River Road.



Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify which resort casinos are:

- 1) built in locations surrounded by prior established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County.
- 2) built in commercial-zoned areas consistent with the operations of a resort casino, entertainment center and hotel.
- 3) built in isolated, rural areas isolated from established residential communities.
- 4) built 15 miles from the closest casino, with 3 casinos in 30-mile distance along a major highway with only a 15-minute drive between casinos.
- 5) built with separate direction transit route to/from the resort casino, separated from local traffic to/from local businesses and residential neighborhoods.

The location of this parcel at the intersection of Shiloh Road and Old Redwood Highway is at the hub of the transit connections from Windsor to Santa Rosa City limits on the east side of Hwy 101, and therefore, a resort casino will have widespread compounding adverse impacts in this entire area.

- 6) built where every zoning restriction on the parcel is ignored and disrespected.

Is this why there are no resort casinos located in the middle of residential communities with two parks adjacent, on major shared transit routes connecting these communities, in a high wildfire risk area with recent devastating fires in 2017 and 2019, on a parcel with unique viticultural value, significant scenic value, a blue-line stream, Riparian corridor and floodplain water, a flat parcel visible from all sides providing defensible space for all the surrounding neighborhoods?

Thank you for your consideration of these concerns.

Respectfully,

CBelden

resident, Shiloh Ridge, Santa Rosa

PLEASE LET ME KNOW YOU HAVE RECEIVED THIS EMAIL WITH EIGHT (8) MAPS INTACT.

Thank you.

From: Jim Boissier
Sent: Wednesday, June 22, 2022 6:14 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

TO: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

List of Statements/Issues

Choose the ones that mean most to you and include in your email to the BIA.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more

appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value

impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of

additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol

related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road

from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the

Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate

brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local

environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events.

How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project’s long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are

highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements,

alarms; noise from visitors' car music, boom boxes, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on

the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard

producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and

defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities.

From: Lynn Darst
Sent: Wednesday, June 22, 2022 1:03 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort & Casino Project

Via Email to: Chad.broussard@bia.gov

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95492

June 18, 2022

RE: Koi Nation Shiloh Resort and Casino Project

I am a resident of Windsor, California and I would be impacted if the BIA were to move forward with the Koi Nation Casino Resort Trust Application. I am requesting a review of the NOP notice. It fails to provide the project details. The link provided fails to define the project. Without this notice there has been a failure to properly notify anyone to the extent of the project and thus should invalidate the notice and it must be circulated again! I appreciate your request for my consideration and ask that they be included in the official record.

As a Sonoma County resident, directly across the street from said project, I vehemently oppose a Casino Resort on East Shiloh Road

In the meantime, here are some of my initial concerns:

RESOLUTIONS OPPOSING KOI NATION CASINO RESORT

- a. Sonoma County Board of Supervisors passed a Resolution opposing the Koi Nation Shiloh Resort.
- b. The Town of Windsor passed a Resolution opposing the Koi Nation Shiloh Resort
- c. The Kashia Band of Pomo Indians passed a Resolution opposing the Koi Nation Shiloh Resort.
- d. Dry Creek Rancherias Band of Pomo Indians passed a Resolution opposing the Koi Nation Shiloh Resort
- e. Coverdale Rancherias of Pomo Indians passed a Resolution opposing the Koi Nation Shiloh Resort
- f. Federated Indians of Graton Rancheria passed a Resolution opposing the Koi Nation Shiloh Resort
- g. Lytton Band of Pomo Indians passed a Resolution opposing the Koi Nation Shiloh Resort

With so many Resolutions opposing the Koi Nation Casino Resort, it speaks to good cause for opposition. Please study the impact upon five local tribes versus a Tribe whose ancestral rights are in Lake County, not Sonoma County. For the Town of Windsor and the Sonoma County Board of Supervisors to also provide Resolutions opposing the Koi Project is significant and the

reasons must be studied.

DRUNK DRIVING CONCERNS

As a family member personally impacted by a drunk driver who killed our daughter-in-law while she was straddling her bicycle off the side of the road, I am passionate about public safety. The 68 acre parcel of land identified for the Koi Casino Resort is in the center of several neighborhoods, churches, schools, parks and a very active local community. Cyclists frequent this particular location. The parcel of land is surrounded by two lane country roads. The danger is real! This is an excerpt from an article in the local newspaper about the Graton Casino, 15 miles south of the proposed Koi Casino Resort.

Press Democrat: June 2018

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pressdemocrat.com%2Farticle%2Fnews%2Fsonoma-county-dui-data-show-where-suspects-drunk-most-recently%2F&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=fjKf59oQy2qsSyM6009OUmMqdPt3qYEAaTYITRXqtV8%3D&reserved=0>

— The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge.

LOCATION! LOCATION! LOCATION!

The proposed Koi Nation Casino Resort is an inappropriate location for ANY business of this size that attracts thousands and thousands of visitors/customers on a daily basis. The roads are rural, schools are nearby and the property is near residential neighborhoods. The two nearby Casinos are either in agricultural area or a commercial area. The Koi Nation project is in the middle of residential neighborhoods. Please conduct an investigation as to how many Casinos were built in existing residential neighborhoods. You will find the answer to be zero.

STAFFING/EMPLOYMENT

The Koi Nation has revealed that they anticipate 1100 employees. This is very concerning for many struggling businesses in Sonoma County that are faced with staffing issues. "Now Hiring" signs are out in front of many businesses, but there is a lack of applicants. In Windsor, alone, we have had CVS close early on a number of occasions due to lack of staffing. The Exchange Bank has closed several times for the same reason. Many banks are now closed on Saturdays because they do not have staff to serve their customers. The Windsor United States Post Office has had to deal with the same short staffing issues and the result has been not to deliver mail on some days, or the current staff being over-worked. Local businesses are unable to fill their staffing needs and as a result have either been forced to close or alter their hours of operation. We, as consumers, are the recipients and it is not a pleasant experience. These are only a few examples. To bring in a business requiring 1100 employees would cause mass devastation for many existing businesses in Sonoma County. Do not let this issue become a detriment to our community. I am asking that a thorough study be done to ensure there is no negative impact on Sonoma County businesses.

April 2022

Press Democrat: Staffing woes dominate Sonoma County government budget talks
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pressdemocrat.com%2Femma-murphy%2F&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFpbGZsb3d8eyJWljoImMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=xz6boqoCWqFd1Xv9Dxvymx7NDEkBIYmrMpHxog97GQw%3D&reserved=0>

Across the county, vacancies exist in about 12% of the workforce, a much higher share than in any year in recent records, according to Christina Cramer, the county's personnel chief.

Press Democrat

May 2017

Labor shortage hits hard in Sonoma County

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.pressdemocrat.com%2Farticle%2Fbusiness%2FLabor-shortage-hits-hard-in-sonoma-county%2F&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFpbGZsb3d8eyJWljoImMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=8pP5E4UD7O7SLY%2BhmkHFs dG3XO7g4dsmmwPpM%2B0ys%2FI%3D&reserved=0>

"It's the worst it's ever been," said Brandon, who has worked here 17 years.

The hospitality sector isn't the only one dealing with a shortage of help. From construction to health care, from food manufacturers to wineries, Sonoma County employers say finding available workers has become a major headache.

DROUGHT

2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. Our household is not watering our garden and we do not flush after each use. The anticipated visitors to the Casino is expected to be at least 20,000 visitors a day. If 20,000 people used the toilet just once during their visit, that would be 20,000 flushes a day times the number of gallons per flush. One must not forget the showers/water usage from the hotel rooms and six restaurants.

All residents and businesses are affected by the drought.

Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

NEGATIVE IMPACTS ON HOME VALUES

As a 23 year resident in the residential neighborhood directly across the street from the proposed Koi Nation Casino project, I have significant concerns on the impact of property values. Please reference this article when determining the impact on home prices in the area surrounding this project.

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdismalscience.journalism.cuny.edu%2F2014%2F05%2F18%2Fcasinos-always-gamble-neighboring-home-values%2F&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d244130>

[8da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjhaWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=nLZuuTwWluQQ6hdIxQZ8fX%2Fjv2AF1vWkxllBMKX2DA%3D&reserved=0](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.sfchronicle.com%2Fcalifornia-wildfires%2Farticle%2FYes-vineyards-can-help-stop-fires-as-they-did-14572161.php&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923023066%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjhaWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=6F44pn2XpAx3ZhLvqdGkKTmHC8P4RkU5P3Ge6FSza6E%3D&reserved=0)

Casinos can, and often do, have a negative impact on home prices of neighborhoods around them. That's because they attract gamblers and partiers flocking to their resorts, leaving some cities facing issues like bankruptcies, crime, traffic and congestion, which can play a heavy role on home values. So while some cities' residents welcome casinos for the promises of jobs and revenue, others hope they never come because of what they can bring.

"Casinos are an attractive nuisance, nuisances on home values," Jed Smith, of the National Association of Realtors, said when citing the "Economic Impact of Casinos on Home Prices Literature Survey and Issue Analyst." "The impacts are negative – the positive benefits are minimal but the negative impacts are substantial."

Please study how decreases in home values will affect homeowners,

FIRES AND EVACUATIONS

The proposed casino is sandwiched along a two lane road and leading to a very busy Highway 101, all of which was gridlock in both the Tubbs and Kinkade firestorms. Combined with the 1100 anticipated employees, delivery trucks for food and supplies, buses and vehicles with gamblers and customers, this is a disaster in the making!!!! There is no safe way of evacuating this amount of people from this particular area without increasing the risk of death.

Please study the impact of adding an additional 20,000+ people to this evacuation route which leads to Highway 101 which is currently at capacity, Expansions to this freeway take decades to complete.

FIRE DANGER AND LOSS OF VINEYARDS

The Kinkade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacama mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

San Francisco Chronicle

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.sfchronicle.com%2Fcalifornia-wildfires%2Farticle%2FYes-vineyards-can-help-stop-fires-as-they-did-14572161.php&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjhaWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=6F44pn2XpAx3ZhLvqdGkKTmHC8P4RkU5P3Ge6FSza6E%3D&reserved=0>

Basically, it burned to the vineyards and then stopped," he said. "The vineyards did a good job of stopping the advance of the fire."

He was observing a phenomenon that other vintners throughout California have been witnessing repeatedly over the past few years: Grapevines are natural fire breaks. And though they are not capable of stopping a fire like Kinkade in its tracks, they may be saving structures and even lives.

“The vineyards — if the vines are well kept and if they’re not letting grass grow underneath the vines — have been helping us as fire breaks,” said Cal Fire deputy chief Scott McLean. “It’s not night and day. Keep in mind these fires have seen dramatically strong winds. But we can definitely fight fire off of these vineyards, using them as anchor points.”

HISTORICAL/ANCESTRAL CONNECTION

The Koi Nation is from Lake County and has no historical or ancestral connection to this to the parcel of land in Sonoma County. The tribe’s prior Rancheria is in Lakeport, Lake County. The Koi Tribe has tried to build casinos in other areas, Oakland and Vallejo and were defeated. The Lower Lake Koi Nation has a viable claim on restored lands in Lake County, not Sonoma County.

ONLINE GAMING

What impact will online gaming have in the State of California??? There is a high probability that the Koi Tribe will face a economic threat from online gaming. Why would a gambler want to get in a bus from San Francisco, ride another 25 minutes beyond Graton, when they can gamble in the comfort of their own home?! Suppose the Koi Nation builds the Casino Resort and no one comes??? They will experience the loss of traffic that other bricks-and-mortar operations have experienced as virtual activities have clobbered industry after industry. (Example: As Amazon expanded its footprint, we have seen retail operations fail). All the revenue projections, all the contributions to the tribe and to the community will disappear before the doors open. The amazing vineyard land would be destroyed. The Casino won’t be needed by the time it has been built. Here is a link to another recent actual example:

Death of the dealership? June 22, 2022

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsantarosapressdemocrat-ca.newsmemory.com%2F%3Fpublink%3D20bace3f2_13484f2&data=05%7C01%7Cchad.broussard%40bia.gov%7C1142c6f407ef41d2441308da548a5ab7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915250809923066%7CUnknown%7CTWFPbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&data=kT5ie%2FsntxziN4pccq9le3JrDpEqPH6B%2Fe20IBU83%2BQ%3D&reserved=0

Sincerely,
Lynn R. Darst

Lynn R. Darst
5845 Mathilde Drive
Windsor, CA 95492

From: Brian Moe
Sent: Wednesday, June 22, 2022 1:20 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern,
We would like to object to the proposal for a major casino and resort adjacent to the Town of Windsor as proposed by the Koi Nation.

1. The proposed project is out of scale with the surrounding community and an inappropriate use of the land. The property in question is agricultural, bounded by residential neighborhoods that would be adversely affected by such a massive development.
2. The Town of Windsor, with a population of 26,000, is largely a bedroom community for Santa Rosa and other larger cities in Sonoma County. Windsor is a family oriented town not suited for the 24-hour comings and goings of gambling buses, drunken drivers and the crime that accompanies gambling enterprises.
3. Sonoma County already is swimming in gambling opportunities, with thousands of ways to lose money already at the Graton tribe's casino just to the south in Rohnert Park and the Dry Creek Pomo casino just to the north in Geyserville.
4. The Koi Nation is a tiny tribe whose traditional territory was to the east in what is now Lake County. For this tribe to suddenly declare their homeland to be adjacent to Windsor just because they have the monetary backing from major developers to do so is disingenuous. Such reservation shopping should not be tolerated.

Sincerely,
Brian Moe
Judy Conrad Moe
PO Box 101, Windsor CA 95492

From: Janice Sexton

Sent: Wednesday, June 22, 2022 9:10 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away increases drunk driving; a center for vice like a casino brings in drug dealers, addicts and a market for prostitution. Please study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock. This Project will be built within 100 feet of my own property.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are

affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Thank you for considering my comments.

*Janice L Sexton
5804 Mathilde Dr,
Windsor, CA 95492*

From: Brian Siewert
Sent: Wednesday, June 22, 2022 11:48 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Tribal Elders,

Our household is so against this casino for many reasons, but the most concerning to me is one no one seems to be mentioning. Highway 101 and Shiloh exit has flooded twice in the last three years, closing the freeway 101 for hours. Old Redwood highway at the high school just south of River Road floods barring that way of evacuation. As weather events get more severe, what is the egress for hundreds of casino guests and employees, plus the locals already here to evacuate in an emergency?

Second, our dear neighbors who are independent business owners bringing construction services and tax dollars into this town and county, have already looked at property in Idaho because they do not want to raise their family of four children in a town that hosts a casino.

Flooding and family values, not to mention this is not a local tribe.

No to this casino.

Brian Siewert
724 Natalie Drive
Windsor, CA 95492



Dr. Hollis Stavn O.D.

Glaucoma Certified

5674 Carriage Ln
Santa Rosa CA 95403
707-527-9137

June 22, 2022

Amy Dutschke Regional Director
BIA Pacific Region
2800 Cottage Way Sacramento CA 95824

cc chad.broussard@bia.gov

RE: Koi Nation of Northern Ca Shiloh Resort and Casino Project.

Dear Amy Dutsch and Chad Broussard

I am writing to vehemently oppose the Koi Nation Shiloh Road Casino Project for so many reasons. Among them is this is near a residential area immediately adjacent to housing of Larkfield, Windsor, and the roads from Shiloh to Healdsburg.

The Highway 101 corridor is already congested by folks driving between Santa Rosa and Windsor.

Adjacent to Hwy 101 is a shopping center of Walmart and Home Depot and many ,many other stores which also significantly impacts traffic. There simply is no more room for more traffic in normal times let alone a fire which would be catastrophic as Highway 101 is the only way out.

Being a resident of this area near Carriage and Faught Lane to Wikiup drive- this area has been impacted by serious fire at least 3 of the last 5 years which last time reached Windsor as well. This area seems to be at the confluence of 3 different fire paths one of which comes over Wikiup Drive from Mark West Springs Road and Napa and Calistoga, and the other over Shiloh and another down from Healdsburg. In short the fires always end up here. This area is also home to Sutter Hospital.

We are still in a drought and there is still extreme fire risk. The danger is significant and real.

We also are in a water crisis. Any project of this size would also affect diminishing water capacity..

I hear the KOI nation is Not local to Sonoma County in its history and I believe all of our County Supervisors oppose this project as well as other Indian Nations.

There is also a severe Dr Shortage In Santa Rosa that impacts patient care and emergency care along this corridor.

I cant think of a worse idea to put in that location as it is detrimental to residential neighborhoods to safety to traffic and to security. This is a really stupid idea. It could be as simple as someone going there throwing a cigarette into the brush and burning down the north half of Santa Rosa.

Sincerely

Hollis Stavn OD.

From: Tom Beckman

Sent: Thursday, June 23, 2022 5:58 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Comments on the proposed Koi Nation Shiloh Resort and Casino Project

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

[2800 Cottage Way, Sacramento, CA 95825](#)

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Close proximity to schools – *There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.*

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - *study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.*

Wildfire Risk – *The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincadee Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel.*

Thank you for considering my comments.

Tom Beckman
1424 Wikiup Dr., Santa Rosa, CA 95403

From: Kacy DeHaven
Sent: Thursday, June 23, 2022 2:37 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I have lived at 237 Lea street since I was 9 years old. Growing up, our neighborhood has always been quiet, as we have a lot of older residents. Some of my favorite memories growing have been my early morning walks with my mom up Shiloh Road and to the Regional Park. We watch the sunrise and it's seems like it's just us and nature. The proposed casino resort would be across from my house, the same road I have walked and jogged up many times for my own peace and health. This casino threatens my peace in many different ways. For one, the many months of construction with the noise and even after the casino would be built it would be taking away my beautiful walk with the vineyards by my side. Secondly, I would not feel comfortable waking up before the sun to take my walks anymore. In fear that someone leaving the casino at that time is either tired or drinking and the road as well. This also doesn't make me feel safe walking alone in my once quiet neighborhood. The Casino will bring many people this way who may wonder over here looking for trouble.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Another huge safety concern would be wildfire evacuations. Unfortunately, we are in an area extremely prone to wildfires. I remember when the Tubbs fire hit and we were urgently evacuated from my house. Everyone was in a state of panic as we watched fire trucks and police whip up and down the roads. My neighborhood being on Shiloh Road and only having one road out was terrifying. I couldn't even imagine the road block that would happen if hundreds of people were to have to be evacuated from a casino resort as well. People lost their lives during the Tubbs fire because they couldn't get out of their houses and neighborhoods fast enough. Then we were evacuated again in 2019 for the Kincade fire and that fire came even closer to our house. It was only finally stopped and Faught Road which is about a quarter mile, if that, from the proposed casino resort. A casino resort on Shiloh Road when a fire hits again would be a disaster on its own.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the

Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

There are far too many cons to even consider a casino resort being built in this area; safety, crime, fire evacuations and others mentioned above are just the ones that hit too close for me. I really hope you can think of the people's lives that will be affected and shut this proposal down.

Thank you for considering my comments.

Kacy DeHaven
237 Lea Street
Windsor, CA 95492

From: Scott Gibson
Sent: Thursday, June 23, 2022 1:25 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Road Casino

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

Dear Ms. Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I'm very concerned that this project review will suffer from racial discrimination of the Koi People. I believe this project should be reviewed without regard to racial or other illegal forms of discrimination. Clearly no other commercial business of the magnitude of the Koi Shiloh Casino would be considered for this location - across the street from a popular public park as well as a family residential neighborhood with children riding and walking about. This casino should be reviewed in the same respect as other non-Native American commercial projects of this size and scope.

I respect and support the Koi tribe's desire for a revenue-generating casino to support their tribe. I would support its construction in an appropriate commercial area, but it is not appropriate for a residential neighborhood. I believe the term for this development would be an 'attractive nuisance,' bringing traffic, crime, and noise and light pollution into this currently calm, quiet, rural neighborhood. This project review should include a review of the impact of other similar casinos to similar neighborhoods - possibly the relatively new Graton Casino in Rohnert Park.

Thank you for your consideration.

Sincerely,
Scott Gibson

From: Doug Knight
Sent: Thursday, June 23, 2022 11:23 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Comments on Koi Nation Shiloh Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region

I am writing to provide comments regarding the scope of the proposed Koi Nation Shiloh Resort and Casino Project. I believe this proposal will significantly affect the surrounding area and the quality of the environment and should undergo a full Environmental Impact Study before any decisions are made.

Here are my areas of concern:

Inappropriate Land Use / Inappropriate Scope and Scale of Project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support and is not compatible with a rural residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the project location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a rural residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, and pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic congestion, and crime, in a residential area. There are other areas in northern California more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike

trails and draws bicycle traffic on Shiloh Road. My wife is a cyclist and rides on these roads often. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood with a park hosting children's sports leagues.

Fire Danger and loss of vineyards – Historically this area has experienced regular wildland fires. In the past 5 years, two of the worst wildland/urban interface fires have swept through this area, the Tubbs Fire in 2017, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. The Kincade Fire was stopped in large part due to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site where thousands of homes were destroyed in one night. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire. My wife and I lost our home in the Tubbs Fire, so this concerns us greatly.

Fire Evacuation Routes – Mandatory evacuations from both fires mentioned above caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuation. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which leads to Highway 101.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake (Lake County) Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The

Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Thank you for considering my comments.

Doug Knight
175 Pacific Heights Drive
Santa Rosa, CA 95403

From: Dahdri McCormick

Sent: Thursday, June 23, 2022 3:12 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] KOI NATION SHILOH RESORT & CASINO PROJECT

To Whom it May Concern:

This is my written strong opposition of the proposed Koi Nation Shiloh Resort and Casino in the area at Old Redwood Highway/East Shiloh Road in Windsor. I am a 30-year resident of Sonoma County. I have raised my 3 children in the vicinity of this proposed project and I currently reside in close proximity of this project.

The proposed location of the casino is not conducive to the character of this part of Windsor. Located in close proximity are established neighborhoods, agriculture, churches, parks, playgrounds and baseball fields all of which will suffer tremendously by the proposed casino project.

The small 2 lane Old Redwood Highway as well as East Shiloh Road could not handle any excess traffic that would be brought on by this project. In addition to traffic congestion the environmental impact to this area brought by traffic, noise and destruction of established agricultural land, the area is set up for an impact to residents, their children and the overall "culture" this area currently holds.

As seen in the previous years of catastrophic wild fires in this area, these roads could not possibly handle more congestion especially in the event of future fires or other catastrophic events.

This particular Koi nation has no known or significant connection to this land or the Town of Windsor. This tribe should investigate land or locations in the vicinity of their origin. In addition, the ignorance of local zoning and building restriction only causes the current area to decrease land and property values for all those in the surrounding areas.

This neighborhood is not the location for a proposed casino . Not even a "resort" with high-end projections. This is a neighborhood with families. These families take walks, play ball, shop and attend churches in this area.

A proposed casino will increase traffic, crime, decrease the current green space and jeopardize emergency time to respond to any future emergencies in the area.

There are other areas more conducive to this type of business. Please keep our Town of Windsor a family community—the reason we chose to live here in the first place.

Thank you for your consideration,

Dahdri McCormick
5811 Faught Road
Santa Rosa CA 95403

From: therese mrozek

Sent: Thursday, June 23, 2022 9:03 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project (the "Project"). To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Fire Issues: If you approve this Project, you will put our community and the additional 27,000 people expected at the Project at a great fire risk. Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the Western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week.

This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked, and in the case of the Tubbs fire, transit became impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and a fast wind driven fire reaches the location, they could die at the casino. There is no sheltering in place during these events; evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they spread and burned, how difficult the evacuation of residents was, and how many died in the Tubbs fire. Please study emergency response staffing during these events and how a casino resort at Shiloh Road will overload these emergency response personnel and vehicles in a future wildfire. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Please study how smoke and poor air quality will impact visitors to the area when the next wildfires burn in the area; please study what the economic impact from weeks of unhealthy air quality and the decrease in visitors to the "Hwy 101 corridor of casinos" will be on a 4th casino resort's revenues, especially when there are already 2 casinos, soon to be 3 casinos in the immediate area.

The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents

north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. This parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting in the recent past and expected management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ properties in surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, will fire fighters will have to choose to protect the neighborhood or the casino? **Do not risk my life or the lives of others by approving this Project.**

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant. **Do not risk my health or the health of others in our community by approving this Project.**

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate, intensifying wildfire risk and diminishing the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risks of wildfire and impact on public health in the community from the drought, and the impact of building and operating a business that will consume massive amounts of water out of the local

aquifer. **Do not allow our local aquifer to be substantially depleted and cause additional water rationing in our community by approving this Project.**

Close proximity to schools, churches, parks and residential neighborhoods

– There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlocked during drop-off and pick-up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day. There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches, and study how many members of these churches will be adversely impacted. Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood. Please study how many residential neighborhoods surround this location. Please study the many transit routes from Hwy 101 to the casino location and how interconnected these routes are with local residential traffic. Please study where the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock, and decreasing public safety. Despite denials from the casino communities, data support the fact that crime increases in areas with casinos. Gambling addiction, and the need for a revenue stream to feed this, increases theft. 24 hour bar activity, both alcohol and cannabis, will increase incidents of intoxicated driving; gambling casinos also attract drug dealers, gangs, and prostitution. Please study the incidence of crime around large casinos and the impact on the entire residential family community, churches, schools, and parks that surround this proposed site. **Do not materially adversely affect the wellbeing of our community by approving this Project.**

No connection to the land by Koi. The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County to start a casino business. This is the third County they have tried to enter outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County. The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Thank you for considering my comments.

Therese Mrozek
825 Shiloh Glen
Santa Rosa, CA 95403

From: Alan Phillips
Sent: Thursday, June 23, 2022 2:48 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments:

Sonoma County does not need another casino.

If it did (and it doesn't), the last place it should be located is adjacent to a residential neighborhood, a community park, and a regional park.

Traffic will negatively affect the neighborhood and Highway 101, which even though it was recently widened to three lanes, will have a great deal of difficulty handling the extra traffic that will result from the employees of the casino and its patrons.

We are in a drought. How much water will the casino remove from our supply? And what about the wastewater produced?

There are many other factors as well which I am sure the Bureau has, or will be made aware of. Please consider them all.

This casino project is a bad idea. Please reject it.

Thank you for considering my comments.

Alan Phillips
5312 Marit Drive
Santa Rosa CA 95409

From: Cliff Whittimore
Sent: Thursday, June 23, 2022 4:02 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I am also writing with extreme opposition to the proposed casino resort at Shiloh Road in the Northern Santa Rosa/Windsor area. Since day one in hearing about this proposal, I have been stressed about the effects this would have in not just my neighborhood, not just Santa Rosa/Windsor but also the greater Sonoma County area. The proposed site is a firstly a residential area and secondly and agricultural area. The massive operation of a casino resort would be extremely detrimental to all facets of life in the surrounding area: homes and families, parks for recreation and youth sports, schools, churches, infrastructure, etc.

I live at 237 Lea Street in Windsor. The proposed casino resort would be right out my back door and across Shiloh Road. The most disturbing issue to me, as a resident, is the threat to the ability to evacuate myself and my family when the next wildfire happens. We were evacuated in both 2017 and 2019. It was terrifying and in 2019 I was convinced from reports that our house was gone. Thankfully, the fire was stopped less than a quarter mile from our doorstep and only 100 yards from the houses on Lockwood Drive. Getting out of the area was difficult in both fires. Long lines of traffic jammed the roads. It was gridlock for a time, in some areas like the Shiloh Road approach to Hwy 101. If hundreds of vehicles/people are added to an evacuation, nobody will be going anywhere, with a very strong chance that people will die. For that reason alone, this proposal is a ridiculous and ill-conceived. Since its proposal in September of 2021, the casino resort has been at the forefront of discussion in the greater area. I am yet to meet one person who thinks this proposal is a good idea and will benefit the area in any way. I have heard only the opposite.

The 72 bullet points below, every single one of them, illustrate exactly why I feel this proposal/project would be 100% detrimental, damaging and destructive to the area.

Thank you for considering my comments and points.

Cliff Tun Whittemore

237 Lea Street

Windsor, CA 95492

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton,

Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars,

trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric tons of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in

drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true

impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as

evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause

varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101.

Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the

possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faught Road and along Faught Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faught Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please

study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/

rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality,

aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "Wildfire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park,

the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

From: Richard Abend
Sent: Friday, June 24, 2022 8:37 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation Shiloh resort and casino project

Amy Dutschke
Regional Director
Bureau of Indian affairs, pacific region
2800 Cottage Way, Sacramento Ca. 95825

I am writing to comment on the proposed Koi nation Shiloh resort and casino project . I feel the BIA needs to extend the time for public comment . 30 days including a federal holiday is not enough time . The public should have time to participate in the NEPA review process. Also this project will significantly affect local environment and should have a full EIS analysis also with public participation.

Our area is composed of family parks , wildlife parks ,residential spaces,churches,and schools . This is not a good fit for a Casio/ resort project of this type and size . Please do not bring Las Vegas to our front and back doors !!! This project will impact our roads with so much traffic that will make evacuation of the area during a fire or other hazards very dangerous. This has already happened twice due to fires and to add a population of a resort and casino would add to the difficulty of getting people out safely! Our community doesn't want the added activity of drug traffic , sex traffic,and drunk driving that comes with this type of entertainment! Our community well water is already at risk due to the climate change and continued drought conditions . Added population of a project like this would be disastrous . The Koi Nation needs to find an area closer to their roots that is a better fit for their project ! Our community has been here most of our lives and the Koi Nation had just recently bought this property with their plans and not considering the impact and damage it would cause the area !
Thank you for considering my comments.

Richard Abend
5925 old redwood Hwy
Santa Rosa, Ca. 95403
Across the street from this proposed project

From: Lynn Caruso

Sent: Friday, June 24, 2022 2:28 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Public comment on Koi Nation Casino development

Dear Mr. Broussard—my public comment is below. Thanks for including it.

Dear Sir or Madame,

My concern with a development of this size and scale is always about the water it will use. This is a very large casino complex, and it will use a lot of water. We have been rationing water here in Cloverdale for a very long time. Putting more strain on limited resources is a very bad idea.

Our reservoir, Lake Mendocino, is currently at about 58% of normal, and Lake Sonoma is at 54% of normal. While above last year's dismal readings in the thirties, our water situation is fairly dire.

Also, This area does not need another casino. We already have the huge Graton casino in Rohnert Park and also the River Rock Casino in Geyserville thirty minutes away. People wanting to gamble can use the existing venues.

My comments say nothing about the impact on roads and existing services such a new development will invariably cause.

Thank you. Sincerely, Lynn C. Caruso, Cloverdale, CA

From: Joan & Scott Gibson

Sent: Friday, June 24, 2022 11:38 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: Joan Gibson <jsgibson@sbcglobal.net>

Subject: [EXTERNAL] Comments on the Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

[2800 Cottage Way, Sacramento, CA 95825](#)

Hello Ms. Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

This issue that are of most concern to me are as follows:

Close proximity to schools, Residential Neighborhoods and neighborhood park –

There are three elementary schools within 1-3 miles of this proposed site, a residential neighborhood within 50 feet of the proposed site, as well as a neighborhood park, Esposti Park, used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. In addition, traffic is already gridlock during drop off and pick up times for these neighborhood schools. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood including the increase in violent crime as well as the impact of adding 27,000 additional vehicles to this area each day.

Fire Risk to Casino Customers & Neighborhood Residence – This is an unsuitable site due to the historic and devastating history of fire in this area. Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any

time of the day or night. This type of business operates 24 hours a day seven days a week. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and the number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers & residence.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Finally, in no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Thank you for considering my comments.

*Joan Gibson
373 Baile de Ciervos
Santa Rosa, CA. 95403*

From: Carlyn Knight
Sent: Friday, June 24, 2022 8:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
[2800 Cottage Way, Sacramento, CA 95825](#)

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

As a resident of Mark West Estates, I have the following concerns:

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Traffic and Gridlock -Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

Thank you for considering my comments.

Carlyn Knight
175 Pacific Heights Drive.
Santa Rosa, CA 95403

From: Laurie Landry
Sent: Friday, June 24, 2022 8:15 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi. Nation Shiloh Resor and Casino Project

Amy Dutscke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way Sacramento, CA 95825

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Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

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Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business

operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

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Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

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Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

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Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric,

property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park

directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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Thank you for considering my comments

Laurie Landry

5830 Leona Ct

Windsor, CA 95492

From: Dana Murphy
Sent: Friday, June 24, 2022 12:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh Windsor casino

This is a terrible idea. There are already two Indian Casinos in the area. We don't need more crime or another casino.

The applying tribe isn't from the area and the Native Americans who are from the area are strongly objecting - quite reasonably. They've been rejected in every area they've applied and should be rejected here as well. There is also a sensitive creek which runs through the property and would have to be mitigated.

Dana Murphy
724 Natalie Dr, Windsor, CA 95492

From: Shannon Schiller
Sent: Friday, June 24, 2022 6:45 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

To: Bureau of Indian Affairs, Pacific Region

Re: Comments on the proposed Koi Nation Shiloh Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public

health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood. **Close Proximity to Residential Neighborhoods** - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Shannon Schiller

From: Mark Catelani
Sent: Saturday, June 25, 2022 6:58 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: MARK CATELANI <mpcat@pacbell.net>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

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The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have

casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf> Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/ pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and

potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Espositi Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes

from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faight Road and along Faight Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faight Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by

the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "Wildfire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County.

Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

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Thank you for considering my comments.

Mark Catelani
5842 Leona Court, Windsor, Ca 95492

June 20, 2022

Mr. Chad Brussard
Environmental Protection Specialist
Bureau of Indian Affairs

Re: Proposed Koi Casino

Dear Mr. Brussard,

I am writing in objection to the proposed Koi Casino & Resort on the southeast corner of East Shiloh Road and Old Redwood Highway. I am a resident of Windsor and I live in close proximity to the proposed development location. I am a Civil Engineer and I work for the Town of Windsor Public Works Department. I manage the Land Development Section in Public Works. Therefore, I am very well informed on the development activity in the Town of Windsor. Following are just a few of the reasons for my objection:

- Zoning and Planning – The property is in unincorporated Sonoma County and is not zoned for the proposed use. In addition, none of the Sonoma County or Town of Windsor long range planning studies have considered the impacts of the proposal at this location.
- Transportation – the primary route of access to the site will be Shiloh Road from Highway 101. I have been involved in many traffic impact studies in the area, especially studies involving Shiloh Road, and none of them have included the impacts of a 400 room hotel and casino at the intersection of Shiloh Road and Old Redwood Highway. In addition, the Shiloh Road/Highway 101 interchange has nowhere near the capacity to accommodate the anticipated traffic.
- Drainage – Pruitt Creek continues to experience flooding during heavy rain events. The mobile home park on the west side of Old Redwood Highway is severely impacted during these events. Hard surface improvements from the project will only add to the flooding impacts of Pruitt Creek.
- Physical Impacts to the Area – The long term impacts to the surrounding area are almost too numerous to list. Noise, light and other physical impacts will be new to the area and will remain in perpetuity.
- Crime – A local Police officer for the Sonoma County Sheriffs Department told me that he was an officer in the Robert Park area when the Graton Casino was first opened. He told me that the rise in crime in the area was off the charts and further stated that the Town of Windsor does not want a casino on this site.

- Koi Nation – It has been published in more than one publication that the Koi Nation consists of 90 members and that the casino and resort is needed to allow the tribal members to be self-sufficient. I find it difficult to understand how a 400 room hotel and large casino is needed to sustain a population of just 90 people.

For these reasons, and many not detailed in this letter, please find an alternate location for the resort and casino. The proposed location is far from the most suitable location for a facility of this type.

I appreciate the opportunity to provide these comments.

A Concerned Windsor Resident,

Carl L. Euphrat

From: Mary Euphrat

Sent: Saturday, June 25, 2022 12:03 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Shiloh Casino and Resort - Mary R Euphrat 6203 Lockwood Drive, Windsor, CA 95492

Koi Nation Shiloh Resort and Casino Project

Mary R. Euphrat
6203 Lockwood Drive
Windsor, CA 95492

Dear Mr. Broussard,

I write this letter to voice my concerns and opposition for the Koi Nation Shiloh Resort and Casino Project. The land that they are proposing to put the resort and casino is currently a vineyard and in an agriculture area. The land is also riparian and is home to many animals and species. Pruitt Creek runs through the land and with heavy rains there has been flooding across Old Redwood Highway in the local mobile home parks. I can't imagine the flooding that will occur once a parking lot and structures are built.

Other concerns are the availability of water since we are in a severe drought, fire evacuation, and the impact the casino would have on the surrounding neighborhoods with an increase in crime, noise, and especially traffic. Shiloh Road and Old Redwood Highway do not have the capacity to handle the traffic that this project would bring. It is also located near two regional parks and an elementary school and several other schools only seven miles away. This is a very quiet area with no industrial or retail centers near this property it just doesn't make any sense to house this project.

In regards to Fire, in 2019 the Kincaid Fire approached the Town of Windsor. We had to evacuate and because of our local road structure it took more than three hours to leave the town. I can't even imagine trying to evacuate a Casino and a Resort in addition to those of us who have already experienced it.

Lastly, it is well documented that the Koi tribe is from Lake County not Sonoma County. That is their tribal heritage and land, not Sonoma County land. I stand with the Graton Rancheria, Dry Creek Rancheria, and Lytton Rancheria tribes to oppose this project which will compete with our local tribes that we support.

For these reasons I oppose the building of this project and ask for your support in stopping this development. It is just not the right location. Please add me to your contact list. I am happy to discuss this in person. Thank you for your consideration.

Sincerely,
Mary R. Euphrat

From: betsy mallace

Sent: Saturday, June 25, 2022 1:59 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; Dutschke, Amy <Amy.Dutschke@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. I am requesting the BIA extend my ability to make public comment for an additional 30 days due to opening the comment period on the Friday before a federal holiday, which did not allow a full 30 days for my review.

I have concerns with the content of the Notice of Preparation (NOP) which fails to provide the project details, nor does it refer to the official website link. www.shilohresortenvironmental.com has a link to the NOP that fails to define the project. As per the environmental regulations, the NOP is required to state the parameter of the project. Without this description in the notice, I believe that it was not properly legally noticed, thus should invalidate the notice and it should be circulated again.

I have concerns that if the BIA takes the title to the vineyard into trust pursuant to section 5 of the IRA that the Koi Nation is not a section 19 of the "Indian tribe" (allowing the title to land to be taken into trust) because the BIA's recognition was unlawful.

I have concerns that any building, project or commercial activity on this parcel will create additional fire hazard to this location and to surrounding locations; will create additional congestion of the only available evacuation emergency route for this location and surrounding locations; will remove the vineyard which has previously acted as a natural fire break (which previously saved lives and homes). This parcel is in a high Wildfire risk location, all impacts must be research, acknowledged and mitigated before advancing this application.

I have concerns with the size and scope of this entire resort, hotel, restaurant, bar, conference center, event center, parking, casino and infrastructure project. Scoping must be done on the entire (aggregate) scale of all published, potential, public or know projects/plans for this location. It is a very small parcel for what is planned.

I have a concern that this tribe has no historical connection to this parcel, land or county. They are not a recognized Sonoma County tribe, they are from Lake County, which they do have a historical connection. This is the third different location they have tried to put into trust (again, none in or near Lake County).

I have a concern with the water supply to this project. The wells on the parcel are currently dry. Where will the water come from? What impacts will be on other

surrounding water supplies? The surrounding riparian areas, the flood plains, the runoff locations?

I have a concern with the additional Green House Gases this project will produce. Removing vineyards and paving permeable surfaces will create excess GHG. Additional car traffic will also create excess GHG and deteriorate the current service levels on local public roads.

I am concerned that this high intensity urban commercial project will forever deteriorate the location and surrounding vineyards, rural residences, parks, churches, and schools.

Thank you for considering my comments.

Betsy Mallace
Windsor CA

From: Gino Rantissi
Sent: Saturday, June 25, 2022 9:58 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to you today to provide comments on the proposed Koi Nation Shiloh Resort and Casino. Over the past several years, our community has been evacuated due to wild fires no less than three times. In addition, Shiloh Road is a small and narrow 2-way street which was overwhelmed by traffic during the last wildfire evacuation. Adding a casino and 200-room resort will impact our ability to flee our next wildfire and endanger lives.

Our community has also faced a water shortage and we are being asked to limit our water consumption. We are considered to be in an extreme drought at this time and there appears to be no end to the water shortage in the near future. The size and scope of this casino would be harmful to our environment and dramatically increase our carbon footprint.

Please understand that this casino is planned to be built in a residential area. This would be the first of its kind in California and would dramatically impact our quality of life for the entire community.

The detrimental effects of this casino would be felt near and far. The site for this proposed casino is inappropriate and should not be considered. Thank you for your time.

Respectfully,
Gino Rantissi

From: Graham Rutherford
Sent: Saturday, June 25, 2022 4:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor proposal

Dear Mr Broussard,

With respect, I urge that the proposed casino for Windsor, along Shiloh Road, be reviewed with care due to the many possible negative impacts on the community. The building of casinos in Rohnert Park and the Alexander Valley has changed Sonoma County in less positive ways, another will only accelerate problems like DUI and other crimes. The Town has another tribe building a resort and housing on its west side, which is a further water and sewage challenge. The Koi proposal will increase these problems and mean two sides of Windsor will have large developments just outside town boundaries. After incorporation, the town intentionally avoided sprawl to protect open space and agricultural land. These proposed developments will strain resources and have long term impacts. The Shiloh site is not the best place for this proposal and should not be developed. Thank you for your consideration.

Graham Rutherford
8649 Planetree Drive
Windsor, CA 95492

Feedback on Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report (EA) for the Koi Nation Shiloh Resort and Casino Project

Greetings,

I am writing to you as a concerned citizen of Windsor, CA, to clearly state my opinion, which is **NO** to the proposed Koi Nation Shiloh Resort and Casino Project.

I have lived in Windsor and raised my family in a house on Shiloh Road that I have owned since 2008. Windsor is a wonderful place live. We enjoy all the great things the community has to offer.

I am frankly appalled that a casino would even be considered in Windsor, much less right on Shiloh Road. Bringing that type of element into the heart of a community will degrade the quality of life on multiple levels. The casino would be adjacent to an existing neighborhood of multiple families with children as well as a regional park. At the opposite end of Shiloh Road is Esposti Park, where families converge for sports events. This would become a “neighborhood casino”, with all the detriments that come with it.

I have received and read the provided Notice of Preparation of an Environmental Assessment/Tribal Environmental Impact Report (EA). Aside from expressing virtually no consideration for the impact on the actual lifestyle and environment of the neighborhood residents, there are several aspects of the report which are severely understated and require additional emphasis for discussion which are provided below.

Firstly, let’s talk about crime. Crime and Casinos go hand in hand. Prostitution, theft, drunk driving, and disorderly conduct skyrocket due to the type of activity and the demographic drawn to the casino. Ask any Sonoma County Sheriff how things have changed since the Graton casino was opened. Having this development will impact not just the immediate neighborhoods, but the surrounding shopping and park areas as well.

Secondly, let’s talk about traffic. Traffic on Shiloh Road is already significant, but supporting the type of volume that a project like this will produce is untenable. There is one lane of traffic in each direction on Shiloh Road, anticipated to be the primary thoroughfare. I expect long lines of vehicles and trucks will be travelling on Shiloh Road during the day and at night, with traffic backed up at Redwood highway (which it already does) making it impossible for RESIDENTS to exit and enter their own neighborhood. Add the inevitable number of intoxicated drivers leaving the project and you have a recipe for tragedy. Evacuation during an emergency event (i.e. a fire) will be reminiscent of other recent tragic evacuation scenarios. What type of assessment has been done on how/if the area can support the traffic? More lanes? Stoplights? These are unfortunate additions to any neighborhood.

Thirdly, noise will increase FOREVER, not just during the construction phase of the project as noted in the EA. A large component of this will be due to traffic, but presumably there will be special events and the general chaos that comes with 100s if not 1000s of visitors coming to party in Windsor.

Does Windsor need a casino? I think not. Does it need to dominate an existing neighborhood? Absolutely not. Anyone who thinks a casino won’t dramatically degrade the quality of life of Windsor is kidding themselves. Bluntly, if the Koi Nation needs a casino, put it somewhere else. This is all about

making money, which we also all understand. But it doesn't have to virtually destroy a neighborhood along with it and generate irreparable urban-decay to the Community at large. It would make just as much money a few more miles away.

The most basic question for consideration is:

Would you want one in your community?

Would you want to raise your family next to one?

I believe the answer is obvious.

Thank you for your support.

Sincerely,

Anthony W. Sarto, Ph.D., Terri Sarto & Family

Windsor, CA

6/25/2022

From: Mary Ann Bainbridge-Krause

Sent: Sunday, June 26, 2022 11:49 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

This is the wrong location for a large commercial casino, hotel, event center, restaurant, bars, parking structures, etc, because of the following reasons.

1. Will significantly affect any future wildfire evacuations.
2. Will significantly affect traffic congestion, noise and light pollution from the entire facility.
3. The tribe has no ancestral connection to the land.
4. Will significantly affect local wildlife.
5. Will significantly affect local water consumption.
6. Will impact the Windsor Town park, which is directly across the street from the resort.
7. There are already two casino, resorts within 25 miles of this facility.
8. Will significantly affect local crime and police activity in Windsor.
9. An Environmental Impact Study must be completed.
10. A local public hearing open to the public must be scheduled so as the public can voice their concerns.

Thank you for considering my comments.

MaryAnn Bainbridge-Krause

170 Espana Way

Windsor, Ca 95492

From: Greg Banfill

Sent: Sunday, June 26, 2022 12:50 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Re: Koi Nation Shiloh Resort and Casino Project – Recommendation to Reject Project

My name and address are:

Greg Banfill

183 Barrio Way

Windsor, CA 95492

The Koi Nation casino being proposed on the corner of Old Redwood Hwy and Shiloh Road make no sense to me. Being in a residential area, across the street from a regional park entrance, and most importantly not on their Indian land. Yes, they now own the property, but it has no historical significance to their tribe. They are in fact a landless tribe as stated here - KOI NATION OF NORTHERN CALIFORNIA V. U.S. DEPT. OF THE INTERIOR Case No. 17-1718 (BAH) (D.D.C. Jan. 16, 2019)

If the Koi tribe were being fully transparent they wouldn't have hidden their identity when buying the property.

The Koi tribe most certainly has backing from out-of-area investors. How else does a 90-member tribe come up with \$12.3M to purchase said property?

I'm sure you know this already, the Koi have tried, and failed, to do this same thing in Oakland and Vallejo. Both times they were funded by outside sources. A Florida real estate investor at the Oakland location, and a Maryland-based investor on the Vallejo project.

All of that aside, a casino near our quiet small town would alter not only the physical landscape but the mental landscape as well. It's a fact casinos bring crime, traffic, and noise.

No one wants more crime in their literal neighborhood.

Although the proposed site is not in the Windsor town limits, it's on the outside border. Our town will take a hit by traffic congestion we already can't handle, and nose on an otherwise quiet side of town.

I respectfully request that you reject the application for the Koi Nation Shiloh Resort and Casino Project. Instead, let them find a community that will welcome them.

Greg Banfill

From: C Belden

Sent: Sunday, June 26, 2022 8:11 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Scoping Comments for Koi Nation Shiloh Resort and Casino project

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
Sacramento, CA

Dear Director Dutschke,

I am sending this attachment with Scoping Comments for the Koi Nation Shiloh Resort and Casino project, dated June 26, 2022. It is a more formal scoping comment letter written without opinion about the project, the site, and the neighborhoods. I have lived and worked in the area since 1986.

First, the size and scope of this proposal require a full Environmental Impact Study because the impacts of

the project are significant affecting tens of thousands of residents and workers in the area. The infrastructure work that will need to be done to accommodate the desired tens of thousands more people

daily to Shiloh/ Old Redwood Highway area will also be widely disruptive. The public need to have the

opportunity to review the scope and comment.

Comparing the locations of Graton Rancheria, River Rock, and Cloverdale with Shiloh reveals important differences: separation from residential areas, separation of transit routes to prevent congestion, and consistency of character with surroundings and compliant with zoning. The intention from Prop 1A is to prevent building casinos in urban areas; Graton R. is located at the edge of an urban area that is commercial, and the 24-hour activity of the casino does not cause disruption, whereas a casino located within a community of residential neighborhoods will cause immediate significant disruptions and conflicts. Graton Resort Casino's location works and the success of the operation is proof.

Location matters and Shiloh will not work: wrong profile, embedded within the neighborhoods of the cities of Windsor and Santa Rosa, adjacent to two parks on Shiloh Road, sharing transit roads with local residents and workers, on a parcel with zoning for land intensive agriculture and residential, not commercial use. The objective of a resort casino, to bring in as many customers as possible, is at odds with the purposes of a residential neighborhood, a peaceful and safe place to raise a family and to live. These neighborhoods have been intentionally planned for housing, open space, and vineyards, to benefit all people, paid for by their taxes. A resort casino here is completely out of character and does not belong in an urban area. The Windsor city limit is on Shiloh Road.

Also, the parcel itself is not suitable for building a resort casino - a blue-line stream within a riparian corridor transects the parcel, with acres of floodway and floodplain, no septic and no building permitted. This parcel has problems that cannot be mitigated. Building on the floodplain will worsen the flooding on adjacent parcels and on Old Redwood Highway. That is why this parcel has not been developed. It is optimally planted to vineyard.

Furthermore, a third casino 15 minutes from both Graton and River Rock makes no sense and will have an adverse impact on all of them, because three casinos in a 30 mile stretch along Hwy 101 is unsustainable and inconsistent with Sonoma County Wine Country aesthetics and values. River Rock

Casino has been adversely impacted by Graton Rancheria Casino; the financial numbers show this to be true. We need to support River Rock Casino.

Finally, Shiloh Road is the only evacuation route for residents living in Mayacama and Shiloh Estates. In the event of any emergency requiring emergency responders or the need to evacuate for wildfire events, any delay or limitation caused by congestion from resort casino traffic could be a death sentence. There is no mitigation for this foreseeable possibility.

The groups behind this development do not understand the area or the land - they are not from here.

Thank you for your consideration of my scoping comment letter.

Respectfully,
C Belden
7366 Shiloh Ridge

AESTHETICS/ VISUAL RESOURCES

Please assess if the proposed project complies with existing zoning restrictions on the parcel (LIA B6 20 F1 F2 RC50/25 SR VOH) as set forth by the Son. County Planning Dept. guided by the Sonoma County General Plan.

Please determine if the visual impact of the proposed project's buildings' heights, scale, number, location of parking garages, entry from bordering roads, building materials, is consistent with the scenic character of the adjacent residential neighborhoods, vineyards, and parks.

Please determine if these buildings have an adverse impact on the off- site views of the surrounding vineyards, parks, and foothills; will the windows causing glare and light adversely affect day and nighttime views from nearby roads, residences, parks, churches, and wildlife.

Please determine if the proposed project complies with the neighborhood character of the nearby area.

AGRICULTURE

Is the proposed land use for a resort casino consistent with the approved zoning land use for this parcel, zoned LIA – land intensive agriculture; parcel is currently planted with premium wine grape vines.

Soils – is the proposed land use consistent with the special characteristics of the parcel, ideally suited for viticulture, with special “white” volcanic soil, significant for special designation in the Chalk Hill AVA (American Viticulture Area).

Does the proposed project maintain the natural resources at their best use.

Please study the impact from building a commercial project on productive agricultural land in the Chalk Hill AVA that will result in a 6% decrease in the total vineyard acreage of the Chalk Hill AVA.

Is this proposed project consistent with the existing land uses in the vicinity.

Geography - Is the site suitable for the proposed project based on the geographic characteristics of the location, at the base of the Mayacama foothills in an extremely high wildfire risk area (2017 Tubbs Fire, 2019 Kincade Fire); on a site with a blue-line stream, Pruitt Creek, traversing the entire length of the parcel, in a Riparian corridor with Valley Oak Habitat, and with a significant floodway and floodplain limiting building constructions and septic improvements.

AIR QUALITY

During construction, please evaluate the dust and diesel particulate matter, pollutants, vehicle exhaust and emissions, and public health risks from emissions.

Please determine the evaluation procedures to monitor air quality for the duration of the construction. After completion, please evaluate the impact of pollution emissions from an increase in vehicle traffic.

Please assess off-site air quality resulting from construction activity and increased vehicle traffic.

BIOLOGICAL RESOURCES

Please identify all threatened and endangered species within the project area, and identify and quantify which species could be directly or indirectly impacted; please identify all critical areas, especially the Riparian Corridor identified by the County with restrictions for development.

Please examine protective measures for the Riparian Corridor.

Please evaluate potential impacts to off-site wildlife from sources of light and glare.

Please assess impacts to plants and wildlife from construction dust.

Please assess impacts to nesting birds in the Riparian Corridor and Valley Oak Habitat area.

Please evaluate if the proposed project adequately protects the Riparian Corridor from all construction impacts and after completion of construction, for the next 100 years.

Please evaluate the flood plain on the southwest part of the parcel for any evidence of critical habitat for wildlife

COMMUNITY CHARACTER

Please evaluate the environmental sensitivity of the proposed project given the site's designation in the Chalk Hill American Viticultural Area, a unique geologic and geographic parcel with the "white" soil characteristic of the Chalk Hill AVA vineyards.

Please evaluate the project's sensitivity to the surrounding residential neighborhoods and vineyards and parks.

Please evaluate the project's sensitivity to the density restriction B6 20, and to the zoning restrictions on the surrounding residential and agricultural parcels.

Please evaluate the project's sensitivity to the quality of life of the adjacent residential neighborhoods, and on the quality of enjoyment of the two adjacent parks, Esposti Park and Shiloh Regional Park

Please evaluate the potential impact of the proposed project on residential property values, crime rates, emergency services, law enforcement services, fire departments, public safety, and the public's peaceful enjoyment of their neighborhoods and parks.

Please evaluate the potential impact of the proposed project on the elementary schools nearby, and school safety.

Please evaluate the impact on competition for employment with the other businesses located on Shiloh Road, in Shiloh Center (Walmart, Home Depot, and the other small businesses) and on the local agricultural businesses.

EMERGENCY RESPONSE

Please evaluate the impact of the proposed project on the emergency response services for the surrounding residential neighborhoods and small businesses, including County and City Fire Departments, County Sheriff, California Highway Patrol, Windsor Police and Fire, Santa Rosa Police, CalFire, ambulance services.

Please evaluate the increase in staffing and emergency vehicles that will be required to provide adequate public safety to the visitors and employees travelling to the site, and when on-site.

Please evaluate the impact of the proposed project on evacuation routes, safety, and road capacity in the event of wildfire; please study the 2017 Tubbs Fire evacuation and the 2019 Kincade Fire evacuation. please evaluate the impact of the proposed project on the wildfire evacuation needs of the surrounding residential neighborhoods that must use Shiloh Road as their only evacuation route

Please evaluate the parcel's location in a high wildfire risk area, immediately adjacent to the burn boundaries of both the 2017 Tubbs Fire and the 2019 Kincade Fire, and the history of evacuations and emergency response.

LAND USE PLANNING

Please identify the potential demand for new housing for employees of the proposed project.

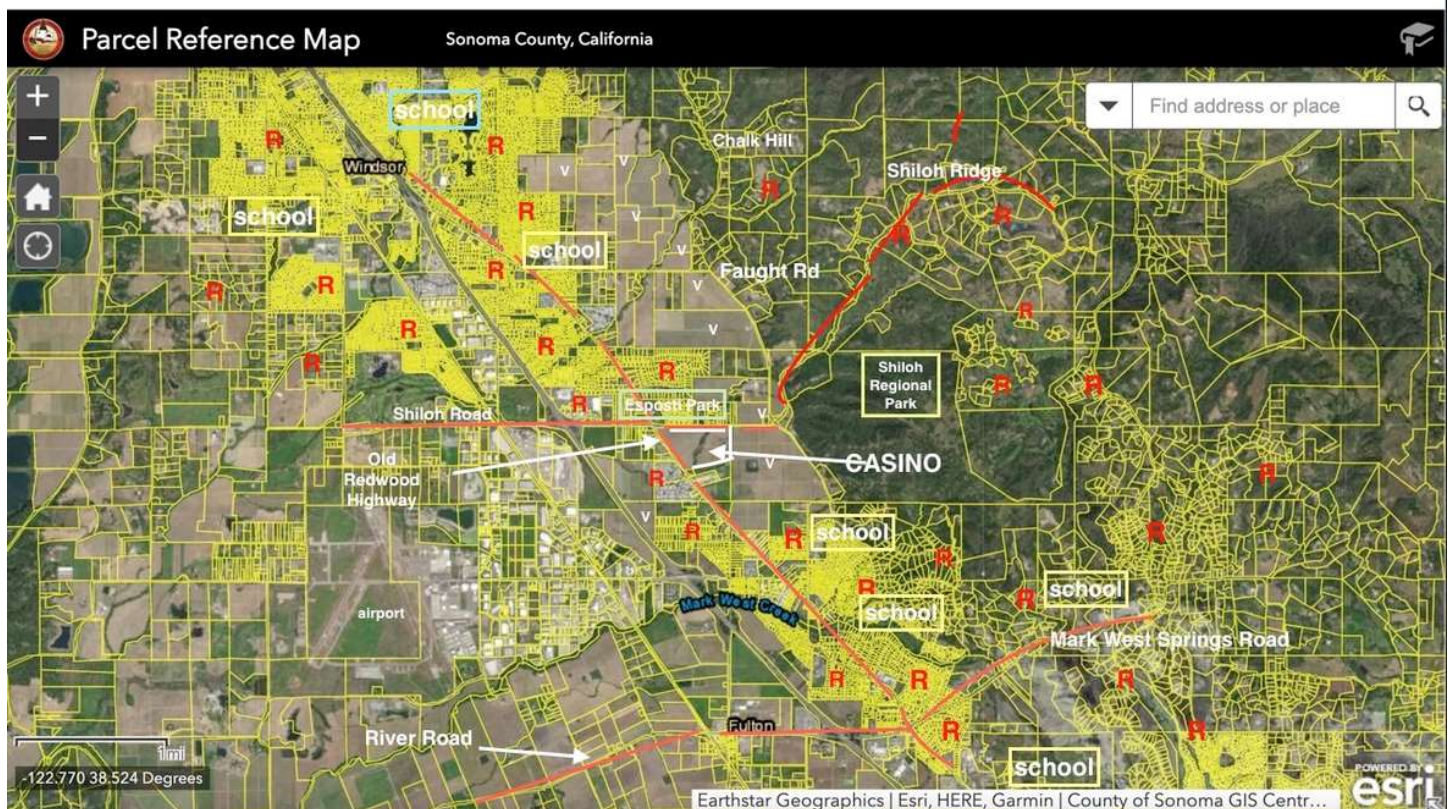
Please determine if the proposed project is consistent with the land use planning for the surrounding vicinity and consistent in size and scope with other businesses in the vicinity.

Please determine if the parcel's zoning permits commercial development.

Please evaluate if the development of a resort casino at the proposed site will significantly impact the surrounding residential areas, and if the traffic generated by the proposed resort casino will significantly impact the current traffic in the vicinity.

Please refer to the parcel maps showing the density of the residential parcels in urban zones.

Please assess the population numbers in the surrounding residential neighborhoods (R).



Please study the Town of Windsor city limits and find that Shiloh Road is on this boundary.

Please evaluate the significance of Windsor's city limit boundary location immediately adjacent to the proposed project, and the foreseeable impact of more residential development in the vicinity on the proposed project.

Please consider the Sonoma County's planned use of this site as part of greenbelt open space plan given the conditions on the parcel which limit development due to the Floodway and Floodplain and Riparian corridor conditions on the site.

Please evaluate the impact of the floodway and flood plain zoning restrictions on the proposed project.

Please consider an alternative site for this development consistent with commercial zoning on a site with favorable conditions for building, and septic and sewer, with separation from residential neighborhoods, and separate transit routes for visitors going to/from the proposed project.

Please assess if the proposed project presents potential land use conflicts.

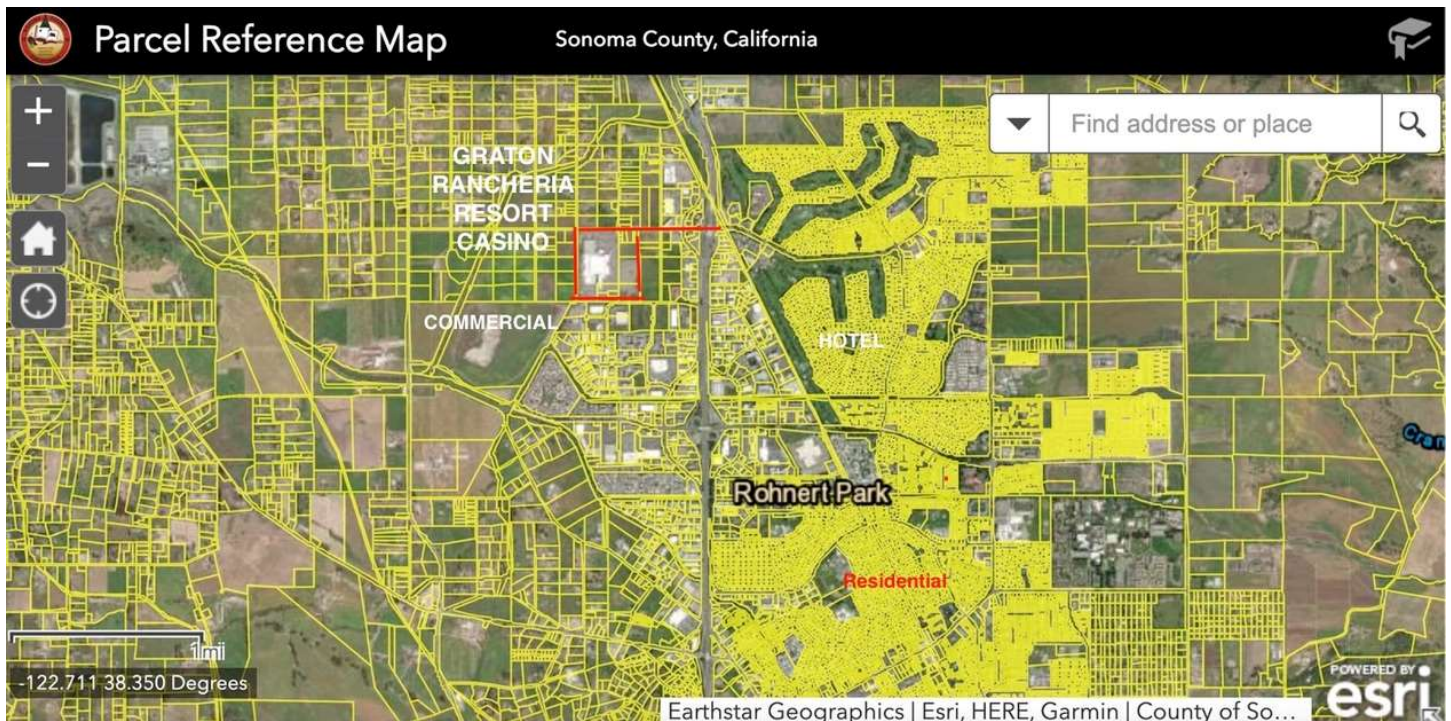
Please compare the land use for the proposed project with the land use for River Rock casino, Graton Rancheria Resort and Casino, and Cloverdale Resort and Casino.

Please study the locations of the three Sonoma County resort casinos land use, zoning, separation from residential neighborhoods, and transit routes separated from local traffic after exiting Hwy 101 in the maps:

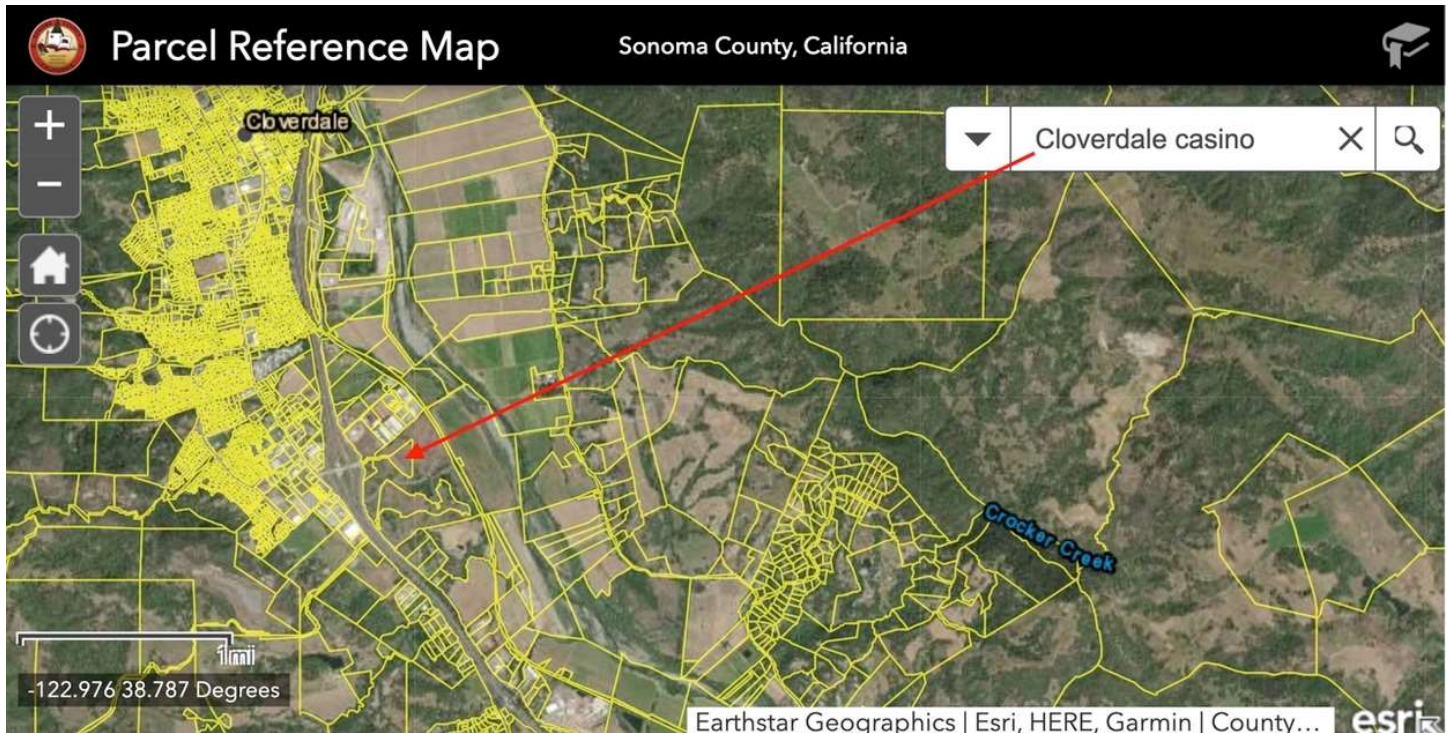
River Rock Casino, Geyserville, separated from residential areas, with separate transit route to the casino.



Graton Rancheria Resort Casino, zoned for commercial use, separated from residential area by Hwy 101.



Cloverdale resort casino location, in commercial area separated from residential area with separate exit off Hwy 101.

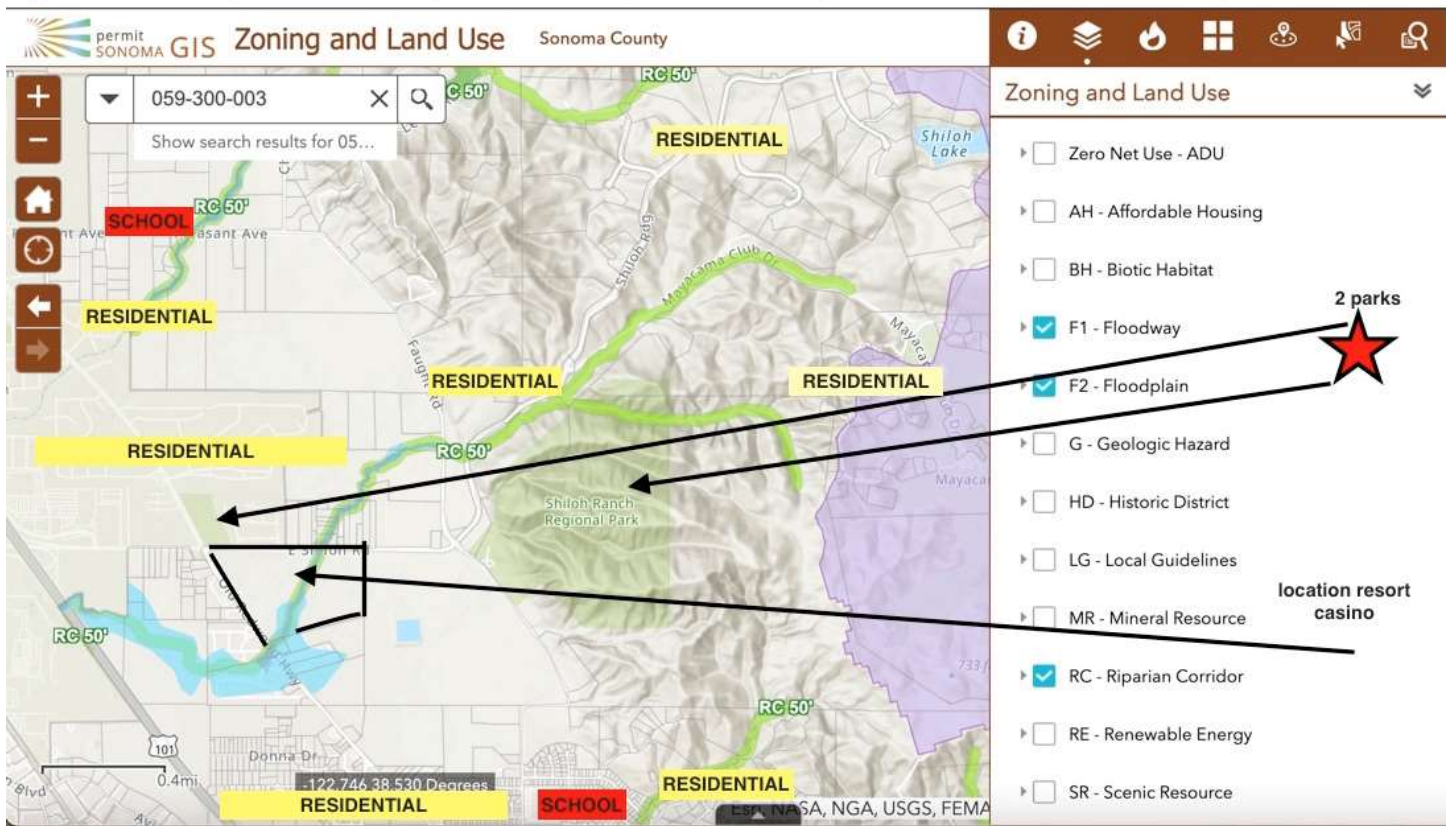


WATER DRAINAGE AND ZONING RESTRICTIONS - zoning: F1 F2 Floodway Floodplain RC Riparian Corridor

Please evaluate the accumulative impact on the proposed project of the conditions imposed by the Riparian Corridor, which transects the parcel, and the F1 floodway and F2 floodplain.

Please evaluate the F1 F2 (floodway and flood plain) zoning restrictions on the proposed project site to "protect against threats to life and property and to implement the provisions of the general plan public safety element." Sonoma County Code of Ordinances, Sec 26-56-005.

(see map next page)



Please find the source of flood water in the adjacent Mayacama foothills, off-site, and study the blue-line designation for Pruitt Creek. What are the impacts of the blue-line restrictions on the proposed project?

Please evaluate the impact of this Floodway and Floodplain on development history of this parcel. and the impact on adjacent parcels and limitations on building structures.

Please evaluate the existing floodway and floodplain on the proposed project's septic plan, wastewater management, and well plan.

Please evaluate the impact of building the proposed project on loss of permeable acreage in a floodway and floodplain. Please study the foreseeable increase in flooding on adjacent parcels and on Old Redwood Highway. Please study the foreseeable contamination of well water on adjacent parcels due to flooding in a septic field. Please study the lack of slope on the parcel and the impact on septic field options.

Please study the impact of the new high-density housing development being built across the street from this site on the foreseeable increased demand for use of Esposti Park and an increase in pedestrian traffic from the housing development at the Shiloh/ Old Redwood Highway intersection.

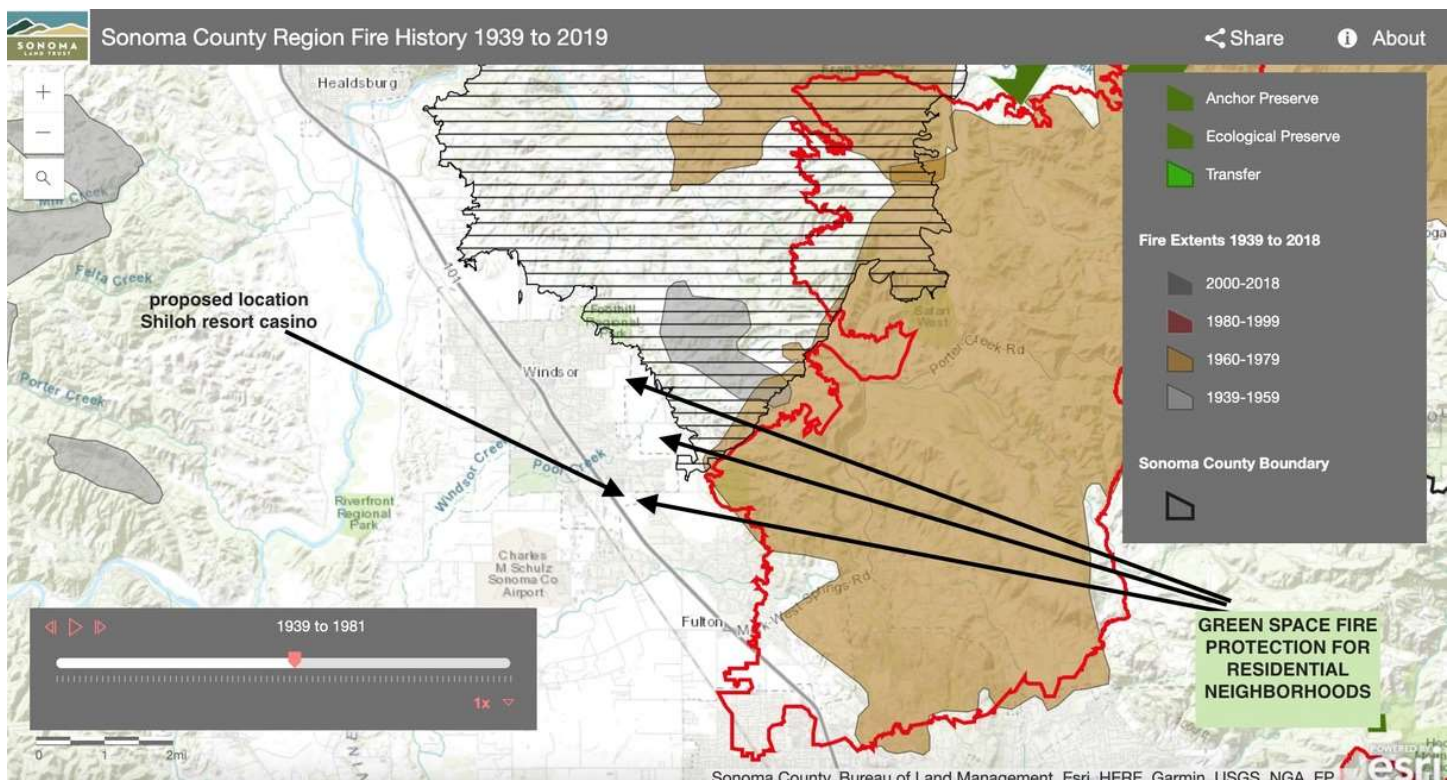
WILDFIRE RISK AND EMERGENCY SERVICES

Please discuss with Sonoma County Fire Department the wildfire risk at this site, to visitors, employees, vendors, and the impact of a large residential population nearby on the significant traffic problems that occurred during evacuations in 2017 and 2019.

Please study the impact of transit routes shared by visitors/ employees of the proposed project and the surrounding residential neighbors and workers on incidence of motor vehicle accidents, injury to pedestrians, prolonged transit time, traffic congestion.

Please study the impact of traffic congestion on emergency first responders and transport to hospitals.

Please study the zoning maps for this site from Sonoma County Planning, the Parcel Reference Maps, and Traffic Study maps in considering the appropriate use for this parcel.



Please consider an alternative site for this development consistent with commercial zoning on a site with favorable conditions for building, and septic and sewer, with separation from residential neighborhoods, and separate transit routes for visitors going to/from the proposed project.

NOISE

Please evaluate the current ambient noise levels, the intensity and sources, in the residential neighborhoods in the vicinity, and in the adjacent two parks, Esposti Park and Shiloh Regional Park, at the picnic area, parking lot, and at direct line-of-sight points in the Park. Esposti Park is across the street from the proposed project and Shiloh Regional Park is only 0.5 miles away at the end of Shiloh Road.

Please study the noise levels associated with the construction phase of the project and with the completed operations of the project. Please identify the sources of all noise, intensity, duration, and time of occurrence.

Please assess the noise levels caused by vehicle traffic, and by vehicle alarms, sirens, warning signals, door locking/opening sounds; please study the impacts of noise generated by emergency response vehicles, police and fire engine sirens, and warning sounds in the vicinity.

Please evaluate the noise generated by increased vehicle travel to the proposed location and the impact on the frequency, duration, times of occurrence, and intensity of alarms, sirens, whistles, beeps, vehicle door opening and closing sounds.

Please study the impact of increased noise intensity and frequency of sirens and alarms on the surrounding residential neighborhoods due to increase in visitors to the proposed project and the foreseeable increase in accidents and crimes, and emergency response.

Please evaluate the noise levels generated by the planned buildings' equipment, generators, air conditioning and heating, and in the parking structures, where amplification and echoes of sound occur.

Please evaluate the impact of these sounds on the adjacent residential neighborhoods, occurring with significant frequency day and night.

Please study the noise impact on neighborhoods located on Old Redwood Highway and on Shiloh Road from the foreseeable increase in emergency response vehicles going to and from the proposed project location.

Please evaluate the noise that will be generated by entertainment at the proposed project, both indoor and outdoor entertainment and its impact on the adjacent residential neighborhoods, on people in Esposti Park and at Shiloh Regional Park.

Please study how far the noise will travel considering the geographical conditions with the Mayacama foothills less than a mile away, and the impact on the residences in this area, and on people in Shiloh Regional Park.

Please evaluate the foreseeable impact of increased noise intensity and frequency on sleep and sleep disorders, and on public health in the areas impacted by emergency response vehicle sirens, horns, and alarms, loudspeakers, and other sources of noise.

Please consider the significance of this impact due to the large population that live in the vicinity.

PUBLIC SAFETY

Please evaluate the current correlation of casinos and crime, DUI accidents and personal injury.

Please evaluate the foreseeable impact of increased vehicle traffic on collisions with pedestrians and residents who live in the neighborhoods surrounding the proposed site, who exercise, walk, run, and cycle on Shiloh Road.

Please study the impact of the new high-density housing development being built across the street from this site on the foreseeable increased demand for use of Esposti Park and an increase in pedestrian traffic from the housing development at the Shiloh/ Old Redwood Highway intersection.

Please evaluate the emergency services' and law enforcement services' ability to provide for public safety, for both on-site and off-site needs, without delay due to traffic congestion, inadequate staffing or response vehicle shortage.

Please identify reasonably foreseeable impacts on crime rates due to the influx of people visiting the proposed project, with consideration of the many transit routes through nearby residential neighborhoods, thereby offering more opportunity for crime to occur.

Please evaluate the impact of the proposed project on public safety at the elementary schools located less than 3 miles away from the proposed site, and the need for increased security due to the influx of visitors to the vicinity of the proposed project.

Please evaluate the Town of Windsor's greenbelt plan to preserve agricultural land as open space not only for aesthetic value but also for public safety and wildfire defensible space for the residential neighborhoods in the Town of Windsor and Santa Rosa.

SOCIOECONOMIC CONDITIONS

Please evaluate the impact of this proposed casino on the two other existing casinos, both located only 15 minutes' drive away, one in a remote area and the other in a commercial area separated from residential areas by Hwy 101.

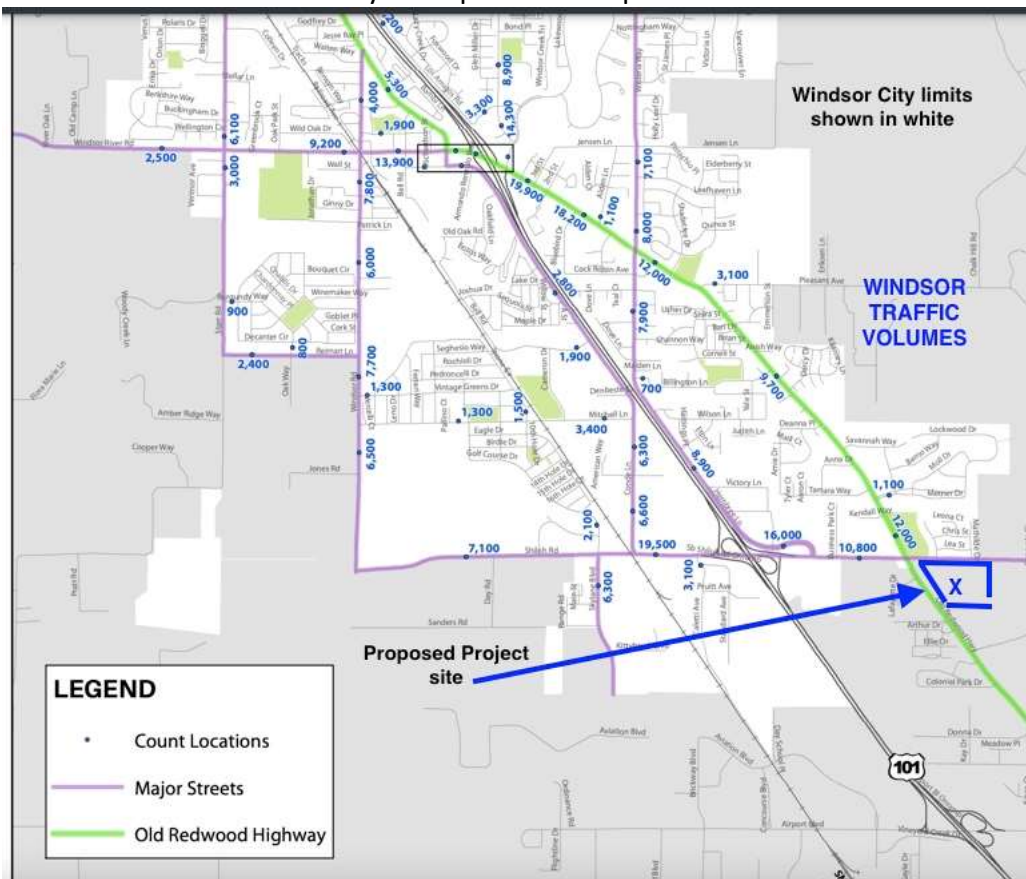
Please evaluate the impact of the proposed project on the surrounding residential neighborhoods' property values.

TRAFFIC/ TRANSPORTATION NETWORK

Please study the many routes that course through the surrounding residential neighborhoods that provide access to this proposed site, and study the impact of tens of thousands of residents that will share these transit routes on the proposed project's employees, visitors, transportation services, vendors and service providers.

Please consider the significance of the impact of the proposed project, located at the intersection of Old Redwood Highway and Shiloh Road, halfway between Windsor and Larkfield, on the populations that are connected by Old Redwood Highway, extending from Windsor to Larkfield/ Mark West.

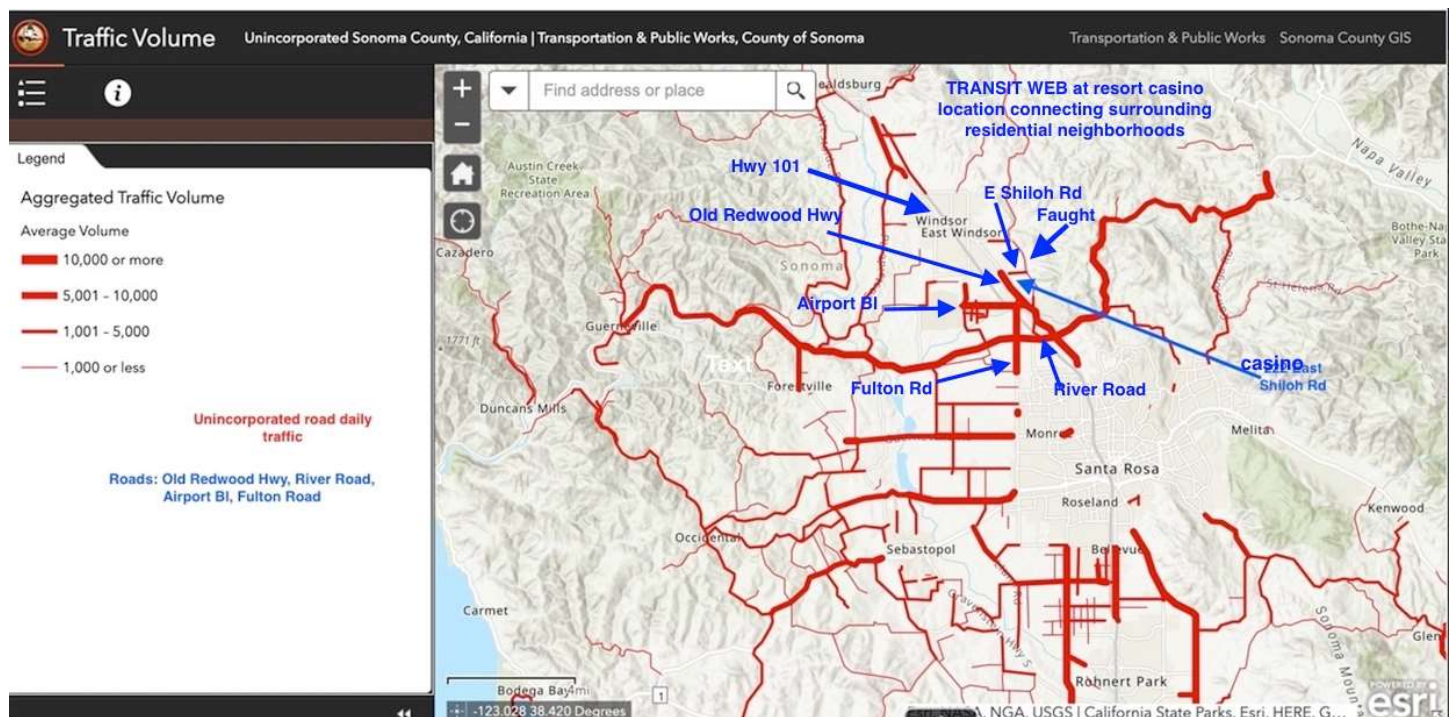
Please study the traffic volumes on the main intersecting routes to the proposed site; see attached maps from Windsor and Sonoma County Transportation departments.



Please study the impact of accidents on Hwy 101 causing increased use of alternate routes to the proposed site. Please review the incidence of accidents on Hwy 101 near the Shiloh Exit for the past 10 years and the impacts on local traffic on Hembree Lane, Old Redwood Highway, Fulton Road, Faught Road, and Airport Bl.

Please identify the Town of Windsor city limits and find that Shiloh Road is on this boundary. Please evaluate the impact of Windsor's City limits boundary location immediately adjacent to the proposed project, and the foreseeable impact of more residential development in the vicinity on the proposed project.

Sonoma County Transportation and Public Works department, Traffic Volume



Please consider the possible foreseeable impacts of congestion and gridlock on emergency evacuation routes from the site when wildfires occur in the adjacent Mayacama Range and Coastal Range, as in 2017, 2019, and 2020.

Please consider the foreseeable impacts from DUI accidents involving residents, visitors to the proposed project, and employees of the proposed project.

Please study the impact of increased traffic causing traffic delays and prolonged transit time to go to/from work for employees at the project

Please study the impact of increased traffic causing delay in emergency response vehicles transit to the proposed project and transit to the closest hospitals.

Please study the impact of increased traffic volumes and increased residential populations on the public transportation services extending from Windsor to Santa Rosa.

Please evaluate the foreseeable roadway improvements that will be required to accommodate the increased vehicle traffic.

WATER RESOURCES

During construction, please estimate the potable water requirement to meet demand.

Pruitt Creek, a blue-line designated stream, is part of the Riparian corridor that transects the parcel. Please examine the restrictions on water use in blue-line designated streams and the impact on the proposed project.

Please examine the restrictions on water use from Pruitt Creek by the proposed project to protect the downstream beneficial uses of the water.

Please identify and describe all waters of the U.S. that could be affected by the proposed development.

Please examine the protections of water in blue-line streams from toxins and contamination by dust sediment, or chemicals.

Please study the impact of the proposed project on loss of permeable acreage and resultant loss of groundwater recharge.

Please review the levels of well water on the site.

Please discuss the hydrology and water quality as they relate to groundwater recharge.

Please identify the watershed for this parcel and study the impact of the proposed project on the watershed area.

Please identify the reliable water source for the proposed project and the cumulative development in the vicinity of the proposed project.

Please identify sources of alternate potable sources to meet increased demand for the next 20 years, during periods of drought.

Please evaluate emergency fire flow requirements for the proposed project.

Please review existing well sites and flow studies from the last 20 years.

Please study the impact of the proposed project's water use on the nearby community for the next 50 years.

submitted by CBelden,
Shiloh Ridge, Santa Rosa, CA
June 26, 2022

I am opposed to the development of the large-scale 24-hour casino/resort hotel Koi Shiloh complex to be located adjacent to the Town of Windsor, CA, on a site where a 68-acre vineyard currently exists.

The general region where the casino is planned has endured numerous extremely close wildfires since 2017, one of which involved the total evacuation of the 27,000 residents of the Town of Windsor. One of the protective features in the area, vineyards that dot the county, act as a firebreak and in many cases limit the spread of wildfires into residential areas. Loss of this vineyard would add to the risk of residents living in residential neighborhoods immediately bordering it, in all directions, particularly to the north and northwest.

The increased traffic from employees (more than 1,100 full-time workers), vendors, gambler-buses and other visitors (estimated to be as many as 55,000 people per day) cannot be supported by the existing surrounding infrastructure.

Building a casino/hotel complex such as this Koi project is not environmentally justifiable. The project construction itself and the environmental impact of an influx of traffic and people, resulting in the generation of greater amounts of gases, increased water consumption in the restaurants and hotel rooms, swimming pool and landscaping, etc. in a region of the country currently in a serious drought condition, with current water use restrictions, and no relief predicted in the foreseeable future cannot be ignored. Additionally, commercial endeavors of this sort are not known for water conservation, so while residents in Sonoma County have diligently reduced their water consumption, the water resources will be siphoned-off by such a project. Even if the casino complex has its own wells, the water consumed will simply be drawing from the common water table that others already have need to utilize.

Certainly, with the recent wildfire evacuation history, and the fact that all surrounding roads are two-lane, creates a vision of an evacuation nightmare/disaster. Historically, it was bumper-to-bumper for hours, without such a casino complex, even as local residents proceeded to evacuate. There would certainly be more chaos when large numbers of visitors to the casino, hotel and restaurants, who are unfamiliar with the area and may likely panic, would add to the mass exodus.

There are certainly other Sonoma County locations that are not surrounded by residential communities and where such a casino/hotel/restaurant complex would not negatively impact the area surrounding such a development. For example, just a couple years ago, the Lytton Pomo Tribe purchased 500 acres just north of Healdsburg, with its own off-ramp of Hwy 101, and a few existing structures, in a rural location, without nearby neighbors. A site such as this would be ideal for such a project.

Apart from all of the above concerns, the damage done to the daily quality of life in the Windsor community that this project would cause is such that I strongly recommend that this project not be approved.

Thank you for your kind attention.

Robert Cobb, P.O. Box 1737, Windsor, CA 95492

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way Sacramento, CA 95825

June 26, 2022

Bureau of Indian Affairs, Pacific Region

Re: Comments on the proposed Koi Nation Shiloh Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, We would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before an federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

WINE COUNTRY!

That is what Sonoma County is called, and known for. Green rolling hills, Forest, and vineyards. The Koi Nation, if allowed, will ruin 68 acres of this beautiful county. The reason we decided to buy the house at 133 E Shiloh Road was to enjoy these green rolling hills, the trees, and the vineyard. Surrounded by vineyards, and the Shiloh regional park within site from our house This was to be our "forever house". Now there is uncertainty? We could have never thought of a worse case scenario. Not even the fires. I cannot think of a more inappropriate location to put a casino that the proposed site on Shiloh Road. Directly across the street from homes and subdivisions, 2 Churches, Esposti park with ball fields, a school bus stop, and at the east end of the land is Shiloh Regional Park. Just moments away are 3 elementary schools and another church. There are many appropriate places. This is just not one of them!

DIRECT IMPACTS TO MY FAMILY

The first impact will be to the value of our home. Our realtor gave us an appraisal with and with out a casino. There will be a \$200.00 loss if a casino is built. This is if a buyer came along that was "ok" with living across the street from a casino.

The next impact will be the construction of the Resort and Casino. 7 days a week, days and night. For who knows how long. Most likely well beyond a year.

Air pollution from all of the exhaust from all of the construction equipment, work trucks, delivery trucks, and the dust that all of them will produce.

Noise pollution from all of the construction equipment, work trucks, and delivery trucks.

The destruction of Shiloh Road and surrounding streets due to all of the work trucks, and delivery trucks on these roads that were not designed for this kind of traffic and weight.

Increased traffic and congestion due to all of the work trucks and delivery trucks.

Ground water quality as a result from the added pollution. As our ONLY water source is our well. This is a major concern.

Impacts after the casino, resort, and parking structure is built. These are forever.

Air pollution from 1200 cars from the proposed staff, the thousands of visitors, buses, delivery trucks, non stop, every day, 7 days a week, day and night!

Noise pollution from 1200 cars of proposed staff, the thousands of visitors, buses, delivery trucks, non stop, every day, 7 days a week, day and night.

Extra traffic from the 1200 cars of proposed staff, the thousands of visitors, buses, delivery trucks

Non stop, every day, 7 days a week, day and night. This is getting to and from our house. Not to mention the back ups at the freeway offramp that will put us in harms way of inevitable rear ending of vehicles, at freeway speeds, into stopped cars. And what if/when another fire comes and immediate evacuations are needed, and I now have thousands and thousands of cars trying to exit a casino right across the street from my house? When there was mandatory organized evacuations it was total grid lock on Hwy 101 and all surface streets. When the Tubbs fire came ripping into Santa Rosa in the middle of the night and it was a TRUE, "run for your life" situation which, unfortunately, 26 people could not in a timely manner and perished in the fire. Do you think thousands of people in this kind of panic are going to let me out? The Tubbs fire burned at a rate of over an acre a second, and moved at miles per hour. What takes a car about 30 – 40 minutes to drive from Tubbs lane to Coffey park took the fire only 3 hours to burn its way through mountainous terrain.

Loss of access to Shiloh Road to walk or bike for exercise and recreation due to the dangers of increased traffic, drunk drivers, and undesirable people walking up and down the street.

Loss of use of Esposti park on the corner as this will be a hang out of undesirables doing or selling who knows what? Unfortunately we all, do know what. Doing and or selling drugs, prostitution, other illegal acts. All of which usually involve the participants carrying weapons. Each of which lead to violent crimes. Our property may/will be the subject of robbery as undesirables wandering around steal to feed their addictions.

COMMUNITY AND BUSINESS IMPACTS

All other community members will suffer the same impacts as my family will.

Business that are currently struggling will have to compete for workers when there is already a shortage. The casino will need another 1200.

Business will suffer as people will stop patronizing due to the increased traffic and undesirables hanging around. This may lead to business closing down.

GOOD NEIGHBORS

We have plenty of good neighbors.

The Koi Nation has said that they want to be good neighbors. This begs the questions. Why did the Koi Nation underhandedly purchase the land on Shiloh Road, hiding their identity and plans to build a casino from the sellers and the community? Why did the Koi Nation not reach out to the community, prior to the purchase? Why did the Koi Nation try and purchase land in Oakland and Vallejo? Why did the Koi Nation decide purchase land in Sonoma County where 5 other indigenous tribes reside when their indigenous land is in Clearlake? Why did they not try and purchase land where they are historically from? Why did the Koi Nation purchase known agricultural land, to take it and destroy it by wanting to build a casino and resort on it for profit. This is exactly what they said happened to their native land

years ago. That it was fertile land that it was taken from them for profit. Then land that was given to them was not fertile and nothing could grow on it. Two wrongs do not make a right.

IN CLOSING

We would ask that each item that we pointed out, undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for considering our comments

David and Sandra George and family
133 E Shiloh Road
Santa Rosa, CA 95403

From: Paul Godowski

Sent: Sunday, June 26, 2022 11:56 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Proposed Koi Casino on Shiloh Road, Santa Rosa, CA

Dear Sir and Madam,

I am writing to express my strong opposition to the proposal to build the Koi casino on Shiloh Road.

This is a quiet residential community with many elderly people and families that utilize Shiloh Road as their only egress in an emergency such as the wildfires that we have experienced in recent years.

I am seriously concerned that we would be trapped given the rise in traffic, the increased traffic would result in risks to the safety of our elders and children and that our already limited water supplies would be further constrained. The link below shows that the recent Tubbs and Kincadee fires came within 1/3 of a mile from the proposed casino.

<https://www.northbaybusinessjournal.com/article/article/map-of-kincadee-fire-and-past-north-bay-fires/>

The articles below provide details of the risk we face.

<https://abcnews.go.com/US/wireStory/california-roads-designed-handle-wildfire-evacuations-62621092>

<https://www.scientificamerican.com/article/new-wildfire-tactic-help-people-flee/>

I hope you can see that building a casino in this residential neighborhood with limited evacuation routes could be a death sentence for both the residents in the surrounding area as well as any visitors to that casino.

This project requires a full Environmental Impact Study and the public should have ample time to review the project scope and comment.

Please consider the impact of the proposed casino:

- 1) On the evacuation of residents in this residential community as well as the people who are visiting or working at that site.
- 2) On the ability of first responders to safely and quickly enter the area during an emergency and prevent the destruction vegetation and wildlife in Shiloh Ranch Regional Park, located less than 600 yards from the proposed casino.
- 3) On the increased traffic, noise and light pollution on the local residents, wildlife and vegetation.
- 4) The already constrained water resources.
- 5) The potential to inhibit access to local recreation areas, including Shiloh Ranch Regional Park, due to the construction of, and operation of, that casino.
- 6) Seriously constrain an infrastructure that has already been taxed with increased population

Please do not allow this project to move forward in this location. It is obvious that doing so would have a huge negative impact on the local environment.

Thank you,
Paul Godowski
1111 Shiloh Crest
Santa Rosa, CA 95403

From: Matt Gustafson

Sent: Sunday, June 26, 2022 11:23 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Propsal

Dear Mr. Broussard,

I hope this email finds you well. I am writing to you with comments on the proposed Koi Nation Shiloh Resort and Casino Project.

I believe as a 23 year resident of Windsor (Ca), This proposal may have significant impact on the community and therefor I highly recommend full EIR be performed in a transparent manner. Please also keep in mind that this community has been affected by four major wildland fires. This community needs to know that this development will not impact them negatively in terms of protection from wildland fires, evacuations, water supplies, etc.

Thank you.

Matt Gustafson

From: Robin Jaskela
Sent: Sunday, June 26, 2022 4:31 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation shiloh resort and casino

Hello,

I'm writing to provide scoping comments on the proposed koi nation shiloh resort and casino project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Water is scarce and we don't need or want a huge hotel that will use tons of water. The area is prone to fires and we don't need more people in the area trying to get out in a massive fire. Also, casinos bring more crime to the area. This area is the wrong location for a casino.

Thank you for considering my comments,

Robin Jaskela
9516 Biggs Way
Windsor, CA 95492

From: Don and Terri Jensen
Sent: Sunday, June 26, 2022 9:35 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard: It is with the gravest of concern that we are conveying this email to you. My wife, Terri and I have lived on Gridley Drive for over thirty (30) years. We raised our children in our home, and it is our intention to (hopefully) enjoy our retirement years in our home. The construction of the proposed casino and resort will greatly hinder, if not eliminate, our right to enjoy the quiet use and enjoyment of our home. From what we can gather from the proposed construction site the entrance to this project will be located across the street from the entry onto Gridley Drive. It is absolutely and completely beyond our understanding and comprehension as to why a proposed project of this magnitude would be considered, let alone constructed, in this location.

The notice relating to the environmental assessment which we received makes no mention of the fact that there exists a public park (Esposti Park) in the immediate vicinity of the proposed project. This park is utilized year around and youth baseball and soccer games are played on a regular basis. Parents utilize East Shiloh Road for overflow parking and, once again, children of very young ages use the park. The construction of this project will have a severe detrimental impact on those parents and children. The amount of increased traffic and the increased chance for accidents is obvious. If I were a parent of young children, I would not want to expose my child to such an environment. The constant traffic, noise and pollution would inhibit the citizens and taxpayers of the Town of Windor from being able to utilize and enjoy a park which was built for their use and enjoyment. Hundreds of people use Esposti Park on a daily basis, and it is a central location for many, many people who meet for bicycle rides around the area. This project will definitely put these many people and activities at risk. The traffic and congestion from the casino will greatly reduce, if not completely eliminate, the ability of people to utilize the park and to enjoy surrounding areas.

Further, there is no mention in the notice of the fact that there exists a church directly across from the proposed project as well as an elementary school in the immediate vicinity. Further, Shiloh Regional Park will also be extensively impacted. Additional traffic will put people at risk and parking will be reduced. The references in the notice to water usage and consumption seem flawed, at best. In fact, they seem to be illogical in light of the severe drought. All of us are being requested (and required) to reduce our water usage while it is proposed that new wells will be drilled in order to accommodate this massive project. The desire for financial gain seems to completely outweigh any concern for the citizens of Windsor (especially people like ourselves who will have to live with this project on a daily basis), for the environment and for the socio-economic impact of the project. Contrary to what you have stated in your assessment there appears to be little, if no, housing availability for any new employees. It is our understanding and concern that the construction of this project will have a severe detrimental impact on the market value of our home. Both my wife and I worked all of our lives to afford to purchase a home in which we could live and enjoy without daily disruptions. Please also be aware of the fact that, as we communicate with you, a 140-unit apartment complex is being constructed on the corner of East Shiloh Road and Old Redwood Highway!! All of these apartments will be completely occupied by the time the casino is constructed. I can only imagine the congestion and increased risks that will be associated with the construction of this proposed project.

I would have to ask the question of why anyone would want to disrupt the lives of a quiet residential neighborhood. Hundreds of people would be adversely affected by the construction of this project. Surely, there must be another location that is more suited for such a project (such as the Graton Casino, which was constructed in a commercial area, not residential). All of the issues raised above pale in comparison to the impact that this project would have on residents nearby. This is a human issue as well as an economic issue for all of these residents. We are upset, frightened and, quite frankly, angry that anyone would even consider this project as there are many, many ways that we will be detrimentally impacted. Our lives will be permanently altered, and our neighborhood will be forever changed. The

noise from traffic going to and coming from the resort and casino (not to mention the many buses that will deliver patrons) will be something that no one can alter or improve. Further, there will be additional noise (sirens at all times of the day and night) associated with increased police, fire and ambulance activity as responses are made to incidents associated with the project.

We have been evacuated twice from our home due to the wildfires that have destroyed much of our county. How will all of the additional people be evacuated in any future wildfires, let alone the residents of our neighborhood? We truly believe that the construction this project will absolutely place lives in danger. You must, in your assessment, consider this factor

It is a mystery to us as to how your notice and assessment failed to even mention, let alone address, the increase in crime which will be associated with this project. We are well aware of the increase in crime associated with the Graton Casino. To ignore this major issue would be remiss on your part. This is our home and elderly people and young children live in the neighborhood. We are asking you to please consider all of the issues raised within this email. We are also imploring you to consider how the lives of potentially thousands of people will be will permanently and negatively altered. In short, we see no logical reason why this project should be constructed in the location that is proposed. It simply makes absolutely no sense to us. Thank you for your consideration to this email and please, please do not ignore the human side of this issue. If you could acknowledge receipt of this email it would be appreciated.

Thank you. Don and Terri Jensen (5837 Gridley Drive).

From: Michele
Sent: Sunday, June 26, 2022 6:05 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Hello,

Subject: Koi Nation Shiloh Resort and Casino Project
Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

This is a terrible location for large commercial hotel, event center, restaurant, bars, parking structures, casino, ect. Currently there are 2 existing Indian casino in Sonoma County. Adding a 3rd in our small family town is a horrible idea for many reasons.

Thank you for considering my comments.
Michele Kipp
236 Usher Dr.
Windsor, CA 95492

From: DEBRA LOPEMAN

Sent: Sunday, June 26, 2022 4:45 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort & Casino

Dear Sir,

We are writing to express our opposition to the proposed resort and casino by the Koi Nation on the corner of Shiloh Road and Old Redwood Hwy in Santa Rosa city limits. This location is too close to a residential subdivision - right across the street, a church across Old Redwood Highway and beautiful Shiloh Regional Park right next door. It will greatly impact each of these, as well as, the residents of Santa Rosa and Windsor negatively by way of increased traffic, noise, crime, police services, fire services, environmental impacts, water shortage impacts, fire evacuation impacts. The list goes on and on, really. Such a poor choice of location with many negative impacts and outcomes. Please don't advocate for this poor location choice of a development on the doorsteps of Santa Rosa and Windsor citizens who value their peace and safety in their own homes as well as church and businesses nearby and the animals that call Shiloh Regional home.

Thank you for considering our comments.

The Lopeman family

1047 Esparto Court

Windsor, CA 95492

From: Michael Moran

Sent: Sunday, June 26, 2022 8:24 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Fw: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

I am writing with extreme opposition to the proposed casino resort at Shiloh Road in the Northern Santa Rosa/Windsor area. Since day one in hearing about this proposal I have been stressed about the effects this would have in not just my neighborhood, not just Santa Rosa/Windsor but also the greater Sonoma County area. The proposed location is a first a residential area and secondly an agricultural area. The massive operation of a casino resort would be extremely detrimental to all facets of life in the surrounding area: homes and families, parks for recreation and youth sports, schools, churches, infrastructure, etc.

I live near Shiloh. The proposed casino resort would be right out my back door and across Shiloh Road. The most disturbing issue to me, as a resident, is the ability to evacuate myself and my family when the next wildfire happens. We were evacuated in 2019. It was terrifying and in 2019 I was convinced from reports that our house was gone. Thankfully, the fire was stopped about a quarter mile from our house and only 100 yards from the houses on Lockwood Drive. Getting out of the area was difficult. Long lines of traffic flooded the roads. It was gridlock for a time in some areas like the Shiloh Road approach to Hwy 101. If hundreds of vehicles/people are added to an evacuation, nobody will be going anywhere, with a very strong chance that people will die. For that reason alone, this proposal is a ridiculous and ill-conceived idea. Since its proposal in September of 2021, the casino resort has been at the forefront of discussion in the greater area. I am yet to meet one person who thinks this proposal is a good idea and will benefit the area. I have heard only the opposite.

I could go on and on, detailing other issues such as noise and light pollution, the existing greenbelt and clear ecological damage, the decline of quality of life and property values, along with years of severe drought.

Please see below bullet points which illustrate why I feel this proposal/project would be 100% detrimental, damaging and destructive to the area.

Thank you for your time and consideration.

Sincerely,

Christina Moran
Amie Drive
Windsor

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and

entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause

varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

From: Amy Ramsey

Sent: Sunday, June 26, 2022 8:21 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

> To whom it may concern,

> I'm writing today to share my strong opposition to the proposed casino on Shiloh Road in Santa Rosa. I am a local resident and live nearby the planned site for this casino. I have many concerns about the casino and believe that it will have a devastating impact on our neighborhood and potentially fatal consequences if/when we experience another wildfire in the area.

>

> I hope you'll take time to carefully consider each of our concerns below and reject the Shiloh casino proposal. Lives are at stake and the future of our community depends on this decision.

>

> - TRAFFIC - THE STREETS WERE NOT DESIGNED TO HANDLE THE AMOUNT OF TRAFFIC THAT WILL COME WITH THE CASINO. THERE WILL BE A CONFLUENCE OF CASINO TRAFFIC WITH RESIDENTIAL COMMUNITY TRAFFIC CAUSING GRIDLOCK/ CONGESTION 24/7

>

> - NOISE 24/7 IN OUR OTHERWISE QUIET NEIGHBORHOOD

>

> - WILDFIRE RISK TO PUBLIC SAFETY INCREASED BY TRAFFIC GRIDLOCK DURING EVACUATION. THIS IS A HUGE ISSUE GIVEN THE GEOGRAPHY AND SINGLE LANE ROADWAYS TO EXIT THE NEIGHBORHOOD

>

> - HARM TO ESPOSTI PARK, SHILOH REGIONAL PARK AND LOSS OF OPEN SPACE/ GREENBELT

>

> - ZONING OF PARCEL DOES NOT ALLOW COMMERCIAL GAMBLING CASINO RESORT BUSINESS;

>

> - BUSINESS OPERATION OCCURS 24/ 7 IN LOCATION SURROUNDED BY RESIDENTIAL NEIGHBORHOODS

>

> - PUBLIC SAFETY AND INCREASE RISK OF DUI AND INJURY/ DEATH 24/7

>

> - HARM TO WATER AVAILABILITY, QUALITY, LOSS OF FLOODPLAIN AND RECHARGE OF GROUND WATER AND WELLS

>

> - LOSS OF RIPARIAN CORRIDOR, WATER FLOW, AND HABITAT FOR WILDLIFE

>

> - LOSS OF PROPERTY VALUES FOR ALL REASONS ABOVE

>

>

> Sincerely,

> Amy Ramsey

> 840 Shiloh Oaks, Santa Rosa, CA 95403

From: Rosa Reynoza

Sent: Sunday, June 26, 2022 1:40 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; Dutschke, Amy <Amy.Dutschke@bia.gov>

Subject: [EXTERNAL] Koi development in Sonoma County

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

June 26 , 2022

I am writing to you as a resident of Windsor, CA who also serves on the Town Council but am not speaking on their behalf. The Town of Windsor did pass a resolution opposing the project, which I supported. Resolution 3743-22, dated April 20th of 2022 link from the Town's website can be found below for your convenience.

I have concerns that any building, project or commercial activity on this parcel will create additional fire hazard to this location and to surrounding locations; will create additional congestion of the only available evacuation emergency route for this location and surrounding locations; will remove the vineyard which has previously acted as a natural fire break (which previously saved lives and homes). This parcel is in a high Wildfire risk location, all impacts must be research, acknowledged and mitigated before advancing this application.

I have concerns with the size and scope of this entire resort, hotel, restaurant, bar, conference center, event center, parking, casino and infrastructure project. Scoping must be done on the entire (aggregate) scale of all published, potential, public or know projects/plans for this location. It is a very small parcel for what is planned.

I have a concern with the water supply to this project. The wells on the parcel are currently dry. Where will the water come from? What impacts will be on other surrounding water supplies? The surrounding riparian areas, the flood plains, the runoff locations?

I have a concern with the additional Green House Gases this project will produce. Removing vineyards and paving permeable surfaces will create excess GHG. Additional car traffic will also create excess GHG and deteriorate the current service levels on local public roads. Where will the employees that are needed to run this operation come by, many local businesses are already struggling to find employees. Will they have to drive all the way from Lake County, which again will add to our GHG.

Thank you for considering my comments.

Rosa Reynoza
Windsor, CA

<https://www.townofwindsor.com/DocumentCenter/View/26707/3743-22-In-Support-of-Retaining-the-SC-General-Plan-Land-Use-Designation-For-222-E-Shiloh-Road-APN-059-300-003?bidId=>

From: Kurt Shaver

Sent: Sunday, June 26, 2022 10:05 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Scoping Comments on the proposed Koi Nation Shiloh Resort and Casino Project

To: Bureau of Indian Affairs, Pacific Region

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process.

Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

My wife and I live just up the hill at the end of Shiloh Road. Having survived numerous fire evacuations over the past five years including one when our entire yard burned up in 2017, we feel that the addition of a large casino into this dead-end canyon would greatly impact our safety during the next (inevitable) fire evacuation.

Even without the added fire risk, this has to be the worst possible place to put a casino. It is bounded on four sides by a county park, residential neighborhood, church, and elementary school.

Thank you for considering my comments.

Kurt Shaver

735 Shiloh Ridge

Santa Rosa, CA 95403

From: Claudia Volpi
Sent: Sunday, June 26, 2022 10:12 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino on Shiloh Road

CC: Casino Project, Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way, Sacramento, CA 95825

Dear Sir and Madam,
I am writing to express my strong opposition to the Koi Casino being built on Shiloh Road.

This is a quiet residential community with many elderly people and families that utilize Shiloh Road as their only egress in an emergency such as the wildfires that we have experienced in recent years.

I am seriously concerned that we would be trapped given the rise in traffic, the increased traffic would result in risks to the safety of our elders and children and that our already limited water supplies would be further constrained. This project requires a full Environmental Impact Study and the public should have ample time to review the project scope and comment.

This tribe has no legitimate claim to this area and other local tribes have submitted to a thorough review process with the community AND are not in residential areas! The placement of a casino in this location would:

Increase wildfire emergency risk and danger to the existing community and elderly residents in case of an emergency

Seriously constrain an infrastructure that has already been taxed with increased population

Have a devastating impact on the ecology and environment of animal life with noise, pollution and already constrained water resources

Set a dangerous precedent for zoning regulations in residential neighborhoods

Lower property values all around the proposed casino

Please do not allow this project to move forward in this location. It is obvious that a tribe of this size, with no connection to this land, is being usurped by others to profit off their status. Do the right thing!

Thank you,
Claudia Volpi
7300 Shiloh Ridge
Santa Rosa, CA 95403

From: betty winholtz

Sent: Sunday, June 26, 2022 12:40 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard and Ms. Dutschke:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

This proposal will significantly affect the quality of the environment. It should undergo a full EIS analysis. The public needs time to have meaningful participate at each stage of the process.

Sincerely,
Betty Winholtz

From: PERRY AUSTIN

Sent: Monday, June 27, 2022 4:32 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I live in Windsor and do not want nor feel that a casino should be built in that location. It is a terrible location as it will impact the local neighborhoods negatively, traffic is already crazy here not to mention the lack of water. In addition, wildfires have impacted our town as well as the nearby local areas. In 2019, our whole town was evacuated for several days due to the Kincaid fire. The Tubbs fire in 2017 also impacted that area and came dangerously close to that location. I am concerned about the possibility of an increase in crime.

I feel that a casino in that location will cause many, many people to sell their homes that are across the street from there. It will be a huge disruption of the life that we all love and appreciate here.

Sincerely,
Perry L. Austin
7910 Fox Hollow PL
Windsor, CA 95492

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

RE: Koi Nation Shiloh Resort and Casino Project.

Dear Director Dutschke,

I am writing to provide comments on the proposed Koi Nation Shiloh Resort and Casino Project. I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full Environmental Impact Statement (EIS) analysis with enough time for the public to meaningfully participate at each stage of the process.

If completed the project would bring thousands of visitors to the area daily. This will result in a significant increase in traffic congestion, noise and air pollution, 24/7 artificial light to the surrounding area threatening the natural environment of migratory birds. The proposed project is surrounded by residential and agricultural sections with a community/family park directly across the Shiloh road and an elementary school a mile away.

A comprehensive, unbiased study of the cumulative impact of this project is necessary now, before the project is cleared to move forward. This is relevant because the size and dominance of the proposed gambling casino and resort at this location will adversely impact the landscape, residential life, and community activities of the whole surrounding area. It will overwhelm the resources of the public, including the diminishing residential water supply, road maintenance, emergency/wildfire evacuation routes and resources for fighting fires and managing crime.

Local air pollution and public health

In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles).

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Water demands and drought:

California is in the midst of a 1200-year drought. Sonoma County is under mandatory water use restriction and the reality if supplies worsening with global warming is inevitable. Please consider what the water demands, both now and in the future, would be for a resort project of this size vs a residential development on the same site. Please study the current and long-term projections for the local water table, local water needs and if our community could withstand the loss of water supply caused by this project.

Pressure on local fire/police/emergency responders' capabilities

This property, and the whole surrounding area is subject to intense and fast-moving wildfires, not only would visitors to a casino resort be at risk, but the whole community would also be threatened by having the designated escape/evacuation routes overwhelmed and in complete gridlock, with emergency vehicles unable to operate. All roads leading to and from the designated property are two lanes only. For residents in the immediate area and the hills above, Shiloh Road is the main, and in some cases, the only escape route out.

Please study the Fire safety scenarios carefully. This project, in this location threatens the community with a high potential to greatly contribute to more loss of life and homes.

Community safety

Please study how many families live in the actual Area of Potential Effect (APE). The APE is far greater than the project site and extends for miles in all directions. A project of this scope will bring an unprecedented adverse element to the greater surrounding area resulting in unintended consequences for the entire community.

The APE should include Windsor and NE Santa Rosa, Mark West, Fulton, and Wikiup/Larkfield, the EIS must consider how the inflow of tens of thousands of visitors daily into area would affect rates of crime and traffic accidents in the surrounding areas. Consider police/fire statistics from casinos in Northern California and identify casino resorts in particular that are built in locations surrounded by long-established communities of residential neighborhoods in areas intended and zoned for residential/ agricultural use only and not commercial use.

Decline in property values

Please study and consider the expected decline in property values both during construction of such a project, and in the long term. Homes and housing units impacted by the direct visibility of the large buildings, parking lots, and bright lights, and the flux of vehicles to/from the casino resort -plus the noise of the increased vehicular traffic and entertainment - will most likely experience a decline in property values and quality of life. The 24/7 presence will significantly decrease the desirability of buying into the area and lower current residents ability rest at night and to use and enjoy their outdoor living spaces.

There are areas in Sonoma County more appropriate for a high volume 24/7 casino business. Please study alternative sites for this project as it is not an environmentally sound project for this location and threatens the wellbeing of thousands of members of the local community.

The proposed site would be better suited and welcomed as a residential development by the Koi Nation to serve its people with an affordable residential community where all families would be able to thrive and continue to enjoy living in the area.

Thank you for your consideration.

Marc Chandler.

(707)889-6381

From: Catherine Ernst
Sent: Monday, June 27, 2022 1:24 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI NATION SHILOH RESORT AND CASINO PROJECT

June 26, 2022

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
200 Cottage Way, Sacramento, CA 95825

Dear Amy Dutschke,

I have learned that the Koi Indian Tribe is planning on building a casino, hotel, resort, plus 6 restaurants on a 65 acre parcel in Sonoma County at the edge of the Town of Windsor. This is shocking to me and very upsetting that this would ever be the spot considered for a casino. This is a family residential area. This plan will drain and negatively impact our health, safety, and quality of life.

First, this is a residential area surrounded by a school, two parks, a church, and many houses. The roads surrounding this acreage are one lane each direction. Wildlife abounds on the eastern boundry and children and families on all sides. That acreage also serves as an agricultural green belt. It is not zoned for commercial building. Windsor is a residential suburb.

Second, consider the environmental impact of extreme traffic, pollution, natural and community resources (water, energy, fire and police departments) that will hugely be drained and effect us. Even wildfire evacuation will be greatly impacted.

Third, the Koi tribe is not even from this county. There are only 90 members who would be effecting tens of thousands of citizen in Sonoma County (490,000). There are already two casinos in our county, one 14 miles south and the other 20 miles north. Three casinos within 35 miles of each other changes the makeup of our community. Also, it will negatively effect our five current tribes. It will also increase crime and accidents/increase drunks and intoxicated driving. This will, once again, effect the health and safety of our local community.

Finally, they want to bring in tribes from Oklahoma to help them run this project?! If we are trying to help our indiginous people of California, of Sonoma County, dont allow other states to be part of this project. The Koi tribe should be looking in Lake County, where they are from, for the location of their casino, NOT IN Sonoma County.

As a concerned citizen, educator, and parent, PLEASE consider all of the above issues. Our environment and citizens quality of life depend on your decision. Please, do not allow the Koi Nation Shiloh Resort and Casino Project to be developed. Do not rush you decision. Allow more than 30 days for public comment.

Concerned citizen,

Catherine A. Ernst
136 Thrushwing Avenue
Windsor, California. 95492

From: ROBERT JANES
Sent: Monday, June 27, 2022 9:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and

accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Close proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the

size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased

traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health.

Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Traffic and Gridlock - Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at

the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of “WildFire Risk Elevated/ no burn” days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned

for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Thank you very much for considering my comments.

Submitted by: Robert T. Janes, 5855 Leona Court, Windsor, CA 95492

From: Hahna Kaiser
Sent: Monday, June 27, 2022 12:54 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation Shiloh resort and casino

Hello,

I am a Windsor resident, writing to express my concerns regarding the proposed koi nation Shiloh resort and casino. There are many many reasons why this location is not appropriate for a casino, not to mention that this tribe has unsuccessfully tried in other locations. This particular tribe is not native to this particular area and the residents of Windsor overwhelmingly do not want a casino. There are numerous casinos in a short distance and as we have seen with the graton casino in rohnert park, the crime comes with the casino. This is a family community and NOT an appropriate location for a casino. Not to mention the environmental impact (NO WATER!!!) as it would be very irresponsible to build such a venue during a historic drought like this. This project should undergo a full EIS assessment along with time for public input at each step.

Regards,
Hahna Kaiser
Windsor Resident

--

- Hahna

From: Rochell Letasi

Sent: Monday, June 27, 2022 9:53 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project Amy Dutschke, Regional Director
Bureau of Indian Affairs

Dear Mr. Broussard,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

This location that was purchased by the Koi Nation for the development is located right across from a neighborhood and a grade school is about a mile away. This area is also in a high fire danger location and we have already experienced evacuations that cause added stress and congestion. A casino along with restaurant and hotel will only magnify the stress and congestion.

This land has been used for vineyards for years and as seen most recently vineyards make a good firebreak. The last thing we need is another large commercial casino with parking garage, hotel and restaurant.

We have a lovely little town. It is family focused and one of the reasons I moved here from Santa Rosa, CA in 1995. We raised 4 boys here and now have grandkids growing up here as well. We need to protect what little rural areas we have left and this is one location that deserves to be saved.

Thank you for considering my concerns.

Rochell Letasi

431 Christopher Way

Windsor, CA 95492

From: A.P. Marsten
Sent: Monday, June 27, 2022 10:35 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino

Sir,

The proposed Koi Indian Casino has the potential of destroying a portion of Sonoma County. A 400 room resort with six restaurants will require an enormous amount of water. We are already under mandatory water use reductions, but an Indian Nation has the ability to ignore any local or state regulations on water use. The Koi Nation could legally tap into the aquifer and suck this portion of Sonoma County dry, to the detriment of the residents and vineyards that depend upon that water.

Furthermore, the location of the Casino would block the escape routes of the neighborhood if there was a fire. Since 2017, we have had to evacuate several times. The Tubbs Fire came up so quick that some residents had less than 30 minutes to escape the flames.

The Koi Nation Casino is a disaster waiting to happen.

Thank you,

A.P. Marsten

From: Pam Janes
Sent: Monday, June 27, 2022 10:24 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO2. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings and additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric ton of additional carbon into the residential neighborhoods nearby. Please study the affects on human health for those who must live near this impact.

Proximity to schools – There is three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract

drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire. Fire Season is now year-round and increasing.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project

includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles.

The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health.

Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino sight. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will

cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Thank you for considering my comments.

Submitted by:

Pamela L. Janes
5855 Leona Court
Windsor, CA 95492

From: Danelle Storm Rosati

Sent: Monday, June 27, 2022 10:45 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Cc: Mario Rosati <mario@storm1.com>; Danelle Storm Rosati <storm@storm1.com>

Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino Project

Attn Amy Dutschke

Dear Director Dutschke,

I am writing along with my husband, Mario Rosati, Esq., to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project.

To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the community, including the environment, public safety, the economy, among many other assets of the Windsor community. This should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process. In our opinion, this casino is not necessary. There are two nearby which more than satisfies the 'need' for northern Sonoma County. I have spoken with several sheriffs, current and retired. They all believe that casinos cause great harm to the communities in which they are located.

We care very much about Sonoma and, in particular, Windsor. This would create a blight on this rural area.

I hope you will deeply consider our comments and all of those from our friends and neighbors.

With best regards,
Danelle Storm Rosati
Mario M. Rosati

From: Rachel Shadburne
Sent: Monday, June 27, 2022 1:12 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

The town directly north of the proposed site is a town built around families, this project is the opposite of what our community stands for or needs.

Rachel Shadburne

Office Manager & Interstate Coordinator
Schultz Brothers Van & Storage
A Bekins Agent for Over 100 Years!
701 Stewart Street
Santa Rosa, CA 95404

From: David Sussman
Sent: Monday, June 27, 2022 7:56 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: David Sussman <davidsussmansf@gmail.com>
Subject: [EXTERNAL] Koi casino project

Dear Director Dutschke

I am writing to you with serious objection to the proposal to build a casino along Shiloh road.

As everyone knows, Shiloh road is a lovely and small community of residential properties without any commercial development east of Redwood Highway.

I cannot understand why a developer of any kind would want to locate a Casino in such a removed location when there are far better commercial properties of equal size for sale, along hwy 101 right near the Shiloh exit , allowing much improved access and visibility. They would make an excellent place to locate such a business ,, while the proposed location on Shiloh Rd will not only be difficult to service, but it will result in hatred of the business by the local community , which will seriously impact the success of any business

Please reconsider the plans to develop at this location and find a far better location nearby which the local community would enjoy to support

Sincerely

David Sussman
resident in Shiloh Estates

From: Unknown

Sent: Monday, June 27, 2022 7:20 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Fwd: Communication for Bureau of Indian Affairs - ACTION NEEDED NOW!!!!

Re: Comments on the proposed Koi Nation Shiloh Resort and Casino Project

To whom it may concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public

TO: Chad.broussard@bia.gov

Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Comments

Thank you for considering my comments.

Commenter's Name
Commenter's Mailing Address

List of Statements/Issues

Choose the ones that mean most to you and include in your email to the BIA.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Loss of Aesthetic Quality of Neighborhood Populations Adjacent to location - study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield. This loss of aesthetic quality will result in decline in property values for the many homes and housing units impacted by the direct visibility of the large

buildings, the flux of vehicles to/from the casino resort and the noise caused by the increase in vehicle traffic as well as entertainment, both inside and outside during evening hours and weekend hours when the residents in the adjacent neighborhoods desire peace and quiet after working all day or for those who work night-time shift, peace and quiet during the day.

Decline in Property Values - Please study the expected decline in property values during construction (for how many years?) and after completion as a consequence of the impact of noise, traffic, loss of aesthetic quality of life. RE: Aesthetic/ social/ public safety – wildfire evacuation, intoxicated driving/ crime, residential property value impacts, noise, residential life activities, proximity to major public parks, transit routes to the casino.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Amplification of Noise - Please study the amplification of noise from a casino resort, its entertainment activities, parking garages, service vehicle sounds, sirens and alarms, and increased vehicle traffic on the adjacent residents and visitors in the hills and Shiloh Regional Park. The parcel is on flat land lying close to the Mayacama foothills and sound will be amplified significantly.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable.

Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric tons of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business will have on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of

crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Close Proximity to Residential Neighborhoods - Please study the proximity of residential neighborhoods to these casinos and the transit routes from Hwy 101 to the casinos. Please study if the transit routes pass into residential neighborhoods and mix with local traffic, compounding traffic congestion and gridlock.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/_Documents/Dam-Failure-Inundation.pdf

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Degradation of Quality of Life During Construction - Please study the duration of estimated construction, possibility of delays, and interference with normal residential activity and how this will be a significant detriment to the surrounding residential neighborhoods: noise interference with sleep, increasing stress, disturbing animals/pets/ horses. Will there be construction occurring during nighttime and weekends with bright lights and noise?

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a

residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer on this area.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Impact - Please study the economic impact on River Rock Casino in Geyserville, Graton Rancheria in Rohnert Park, and the new casino in Cloverdale; all are located along the Hwy 101 corridor but in areas compliant with commercial zoning and isolated, rural zoning.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Emergency Response Times - Please study the emergency response time of fire, police/sheriff and ambulance service during high traffic volume times and study the frequency of gridlock on Hwy 101 and the local streets and ORH. Please assess how the increase in traffic to a casino resort at this location will further impair and add to duration of gridlock.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western united states directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Increase in Fire Danger- Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the exiting neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to

the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Season is year-round and increasing –

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlock and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has flooded overflowing onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various element of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse

effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water **and the effects on the aquifer.**

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location. The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Infrastructure roads- All roads in all directions from the proposed casino sight are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please

study what the impact on existing roadways will be from the guests, delivery trucks and buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study and impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife.

Local air pollution and public health - In addition to greenhouse gas pollution, please study the possibility of local air pollution and public health impacts from increased vehicle traffic on neighborhood roads and highways, as well as the impacts from idling vehicles (including construction, delivery, and passenger vehicles). The review should consider all phases of the proposed project, including the foreseeable increase in air pollution from commercial trucks and off-road construction equipment during the project's construction, from delivery trucks and other commercial vehicles during the project's daily operations, and from buses, shuttles, and other passenger vehicles. The EPA has found that people who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. It is likely that a project of this size will have a measurable impact on air pollution in nearby neighborhoods. Please assess the possibility that there will be a public health impact due to an increase in particulate matter, air toxics, and NOx, as well as any other foreseeable air pollutant.

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Location of Other Northern California Casinos - Please study the location of the other 47 casinos in Northern California and identify casino resorts that are 1) built in locations surrounded by long-established communities of residential neighborhoods, in areas specifically zoned for residential/ agricultural use only and not commercial use, where development is regulated for the benefit of all the residents of the County. 2) built in commercial-zoned areas consistent with the operations of a casino resort and entertainment center and hotel. 3) built in rural areas isolated from established residential communities. 4) built 15 miles from the closest casino, with 3 casinos in 30 mile distance along a major highway (15 minute driving between casinos). 5) built with single purpose/ direction transit route to the casino resort that separates casino resort traffic from local business and residential traffic. Please study the cumulative impact of these concerns now, during construction, and for the following 50 years. This is relevant because the size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposti Park and Shiloh Regional Park, and impose its increased traffic and noise on the entire community of neighborhoods from Windsor to Santa Rosa.

Loss in Property Values - Please study the impact on property values in the area and desirability of a family to own a home and raise their family when a casino resort is approved, under construction and fully operational. Please study the impact on the many mobile park homes located adjacent to this parcel. Please evaluate the evacuation routes from these casino locations and the impact of the increased visitor/ employee/ vendor/ service providers' traffic on the local residents' evacuation routes, and how this impact will reduce the value of residential properties.

Loss of Flood Plain - Please study the impact of loss of flood plain acreage, causing diminished ground water availability, well water and water table levels; degrading water

quality for Windsor and NE Santa Rosa residents. Please study the scale and impact of loss of flood plain on this parcel.

Loss of Night Sky Due to Light Pollution - Please study the impact of night lights from 5pm to 7 am for 6 months yearly, and slightly shorter during the late spring through fall, on wildlife in Esposti Park, Shiloh Regional Park, and the riparian corridor. Please study the current value of light pollution and what will be the expected increase in light pollution from the casino resort, during construction and for the following 20 years.

Loss of Open Space and Green Belt - Please study the loss of this open space on the quality of the scenic corridor along ORH and Hwy 101, and along Shiloh Road, and from the view at Esposti Park, and for all visitors to this area for tourism and athletic events. How will this impact stress and mental health of the residents? How will this change the unique character of Sonoma County Wine Country as seen by visitors along Hwy 101 and to what extent does the commercialization of agricultural land/ loss of vineyard degrade the tourist experience?

Loss of Riparian Corridor - Please study impact upstream and downstream and at Shiloh Regional Park and Esposti Park, and the surrounding neighborhoods on loss of the habitat in the riparian corridor that extends diagonally across the entire parcel. Please evaluate the importance of this riparian corridor to the local vineyard and neighbors, during wet winter conditions and during dry summer conditions. Please study the economic value of water used by the local agriculture near this parcel, and its significance for recharging the aquifers, ground water and local well water tables.

Loss of Scenic Corridor and decrease in Green Belt space/ open space – Please study impact on the loss of scenic corridor visible from many areas surrounding this parcel which lies in the flat area at the base of the Mayacama foothills, and is now visible directly from all along Old Redwood Highway in this area, along Shiloh Road to Faight Road and along Faight Road, as well as from Hwy 101 looking eastward, and along River Road in the Fulton area, looking eastward; also a casino resort will be immediately visible and heard from vista points on west facing Shiloh Regional Park, from the picnic area and parking area at Shiloh Regional Park, and from the entire area of Esposti Park. Please identify the many special events along Faight Road/ Shiloh Road/ Old Redwood Highway/ Fulton – Iron Man and Half Iron Man triathlete, Gran Fondo and Century Ride cycling events, school track/ cross country running, tourist cycling groups. These groups come to this location because of its special open space “rural” quality and vineyards, even though it is close to ORH.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals.

Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. habitat. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service Recent has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mud flow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mud flow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Neighborhood Populations adjacent to location – study how many residents will be impacted by traffic/ noise/ light pollution/ loss of scenic corridor/ inflow of tens of thousands of visitors daily into area with increase in crime and accidents/ increase in drunk and intoxicated driving accidents on local residents. Please study how many families live in these neighborhoods, how many students attend the local elementary and middle and high schools served by the residents in this area – in Windsor and NE Santa Rosa, Mark West, Fulton, Wikiup/Larkfield.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding

neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise - From increased traffic and during construction; noise from entertainment at casino resort – special events, indoor and outdoor music, loud speaker announcements, alarms; noise from visitors' car music, boom bases, broken/absent mufflers, motorcycle engines, cars locking and car alarms, reverse alarms on service vehicles; noise from pet dogs barking in response to noise from the casino resort, impact of noise on pet animal health, impact on local goats and sheep and chickens; impact on horses on Shiloh Road, Faught Road, and Shiloh Regional Park.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Public Safety – Study the impact caused by the increase in drunk/ intoxicated driving on all routes connecting with the casino resort and consequent harm to the surrounding residential neighborhoods, schools, churches, and small businesses.

Quality of Neighborhood Activities - Please study impact of gambling casino bringing tens of thousands of visitors to the area on the existing quality of the neighborhood parks supporting outdoor activities: at Esposti Park – sports teams, parties, rest/recreation; at Shiloh Regional Park – parties/ horse exercise/ hiking/ walking/ rest/recreation; along Shiloh Road - walking, running, dog walking, outdoor enjoyment of quiet neighborhoods. Please study the uses of each park by month and annually.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed the casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

Traffic and Gridlock -

Please study the impact on all transit routes from Windsor to Santa Rosa on the east side of Hwy 101 and on the west side along Slusser Road to River Road; impaired evacuation during wildfire emergency; impaired emergency response when traffic gridlocked – ambulance, fire, police, sheriff, CHP, noise and sleep disturbance, stress, harm to mental health.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water Availability During Drought - Please study the impact of water scarcity on surrounding communities and competition for available water by a casino resort and entertainment center. Please study impact on ground water availability and quality, aquifers, and wells used by residents in surrounding communities. Investigate wells that have already had to be redrilled due to running dry in this area.

Water rationing- The project application identifies existing and proposed on-site wells for the projects water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Wildfire Risk – The loss of green belt / open space/ defensible space at interface of High Wildfire Risk area/suburban area; traffic gridlock and blocked evacuation route for all residents north/east/south of parcel; competition for limited supply of emergency response teams/ services for any adverse event due to increase in visitor traffic and population to the area; competition for Fire Dept. response in case of Wildfire. Please study the CalFire Fire Incident maps outlining the extent of the Tubbs and Kincade Fires, and the LNU Complex Fires of 2020 and evaluate the risk of harm to visitors to a casino resort located at this parcel. Please study the evacuation necessary in each fire and the speed of the wildfire spread for each. Please study the number of days of "WildFire Risk Elevated/ no burn" days for this area from 2015 to the present day. Please study the number of power outages for wildfire protection during high wind events for the years 2015 to the present. Parcel is located at the edge of two recent devastating fires, Tubbs Fire 2017 and Kincade Fire 2019 – please study the management of wildfire fighting and management of the casino resort visitors/ employees/ vendors/ service personnel in the case of a wildfire situation such as occurred in 2017, and in 2019. Please study how the response to each fire would impact the surrounding neighborhood communities and if the limited availability of emergency resources would cause harm to the residents/ property surrounding neighborhood communities. Please study the increase in property insurance rates for wildfire risk if a casino resort is on this parcel. Please study the impact of diminished fire protection for the surrounding neighborhoods of Oak Park, the trailer park across the street, the homes next to San Miguel Elementary School, the newly built housing project across the street from Esposti Park. Instead of having more

space for the fire to be contained, fire fighters will have to decide to protect the neighborhood or the casino?

Youth Sport Leagues- Esposti Park Is home to youth football league tryouts and team practices as well and little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

Impact of Ignoring Zoning Restrictions – Please study the impact of such significant zoning changes. Building a commercial operation on this 68 acres will result in loss of 68 acres of land intensive agriculture (LIA); this land has high value as vineyard producing premium pinot noir in the Chalk Hill AVA. It is premium agricultural land based on its geologic characteristics and location in Sonoma County. Land of this quality is in limited supply in Sonoma County and is consequently zoned as LIA, not commercial. It is the intention of the Sonoma County General Plan to preserve the valuable agricultural land in Sonoma County. This is the foundation of the annual tourist industry that brings over \$3 billion in direct revenues to the County. Loss of the 68 acres to a commercial operation will result in loss of 68 acres of scenic corridor and open space, specifically part of Windsor's Green Belt suburban design plan to maintain open space and vistas around the residential neighborhoods. This Green Belt area provides high aesthetic value and increases the property values of all the adjacent areas. Loss of this 68 acres will reduce the amount of open space and defensible space, bringing the wildfire/urban interface closer together, increasing the wildfire risk to the neighborhoods. Please study the increase in property insurance for these surrounding neighborhoods if the casino resort is allowed. This parcel is zoned for 20 acre minimums for each residence, allowing only 3 single family residences on a 68 acre parcel. Loss of 68 acres of Flood Plain with consequent loss of water for recharging the aquifers, groundwater, and wells. Loss of the Riparian corridor, with the Valley Oaks, will cause loss of habitat, a detrimental impact on wildlife, and loss of water collected in the stream during winter rains, with consequent diversion of water that has been supplying the surrounding communities. Building the casino resort with tall buildings - ? how tall? that block the scenic vistas from Hwy 101, from Old Redwood Highway, from Esposti Park will significantly degrade the aesthetics of the now rural area, to the detriment of all visitors who come to this area to enjoy outdoor activities in Esposti Park and Shiloh Regional Park.

From: Dylan Whittemore

Date: June 27, 2022 at 10:35:51 PM PDT

To: "Broussard, Chad N" <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Casino and Resort Project

Amy Dutschke

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way

Sacramento, CA 95825

My name is Dylan Whittemore. I am writing to say that I am very opposed to the Koi casino and resort idea. I just turned 15 years old today. I have lived at 237 Lea Street in Windsor, CA since I was 2 years old. When I heard about this idea of putting a big resort and casino near the Windsor area and near my house, I felt like I got punched in the face. There are families and kids all around here. This is NOT the right place for a big building plan like this casino. It would change and hurt everything!

There is wildlife on that property day and night. I hear them and see them. We have great parks in the area that would be affected very bad. I have played baseball and football at Esposti Park. I think a big resort would change the way people are around here. It sounds dangerous and just wrong for this area. I hear that this group of Indians aren't even from here. That's wrong. Isn't it? Also that other groups of Indians are very against this casino plan near Windsor.

My biggest problem is that we have been evacuated twice because of wildfires. It was so hard to get out of the area because the freeway was all backed up. We barely got out in the Tubbs fire. I remember that my dad went back for our stuff and they wouldn't let him back on Shiloh road. It was a horrible time and so was the 2019 fire. These fires will keep happening because of global warming.

Please listen and help this area be safe and open like it is.

Thank you.

Dylan Whittemore

237 Lea Street

Windsor, CA 95492

From: Brian Williams
Sent: Monday, June 27, 2022 6:06 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region 2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Aesthetics – Visitors come to Sonoma County for the aesthetics of the area which is generally bucolic, rolling hills, forest. Residents buy homes and live in neighborhoods that incorporate this same aesthetics. This project destroys the beauty of the region and replaces it with buildings, parking lots and structures, artificial light, traffic and congestion and crime, in a residential area. There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals who are from another region of California. Please study alternative sites for this business.

Bike Races, Rider, Tours – This area is home to annual bike races, triathlons, cycling club routes, as well as pleasure riding. Shiloh Regional Park is home to mountain bike trails and draws bicycle traffic on Shiloh Road. Adding the volume of additional cars, trucks and traffic to Shiloh Road will make biking in the area unsafe and undesirable. Please study the safety of bike riders, tours, races and recreational cycling with this added traffic volume.

Carbon Dioxide Emissions – A typical passenger vehicle emits about 4.6 metric tons of carbon dioxide per year. This assumes the average gasoline vehicle on the road today

has fuel economy of about 22 miles per gallon and drives around 11,500 miles per year. Every gallon of gasoline burned creates about 8,887 grams of CO₂. Graton Rancheria has 10 million visitors per year, or about 27,398 per day. This brings an additional 42 metric tons of carbon dioxide per year or 115,068 metric tons per day into Rohnert Park. This proposed project has twice the square footage of Graton Rancheria. This could mean twice as many visitors per year, 20 million, 54,000 per day and 84 metric tons of additional carbon into the residential neighborhoods nearby. Please study the effects on human health for those who must live near this impact.

Close proximity to schools – There are three elementary schools within 1-3 miles of this proposed site. Traffic is already gridlock during drop off and pick up times for these schools. Please study the impact of adding 27,000 additional vehicles to this area each day.

Close proximity to Churches – There are two churches across the street from this proposed site, Shiloh Neighborhood Church directly across the street 50 feet away, and Christ Evangelical Lutheran across Redwood Highway on Shiloh. These churches are part of the residential community this proposed project will impact. Please study the effect of adding this type of business on the family community of churches.

Construction Phase – This massive construction project will add tons of particulates and exhaust into the air of the residential neighborhood. The construction vehicles will add additional carbon dioxide above and beyond what was mentioned regarding the impact of the operation of the casino itself. The noise will disrupt any attempt to live normal lives in the homes surrounding this site. The construction will continue into the foreseeable future as there will be no restrictions on what they can do once this land is restored to the tribe. Please research the long-term effects of construction on children, and the elderly who live and play in this neighborhood.

Crime – Despite denials from the casino communities, data supports the fact that crime increases in areas that have casinos. Bringing addicts, to gambling and the need for a revenue stream to one place increases theft; providing unlimited alcoholic beverages to people who drive away, increases drunk driving; a center for vice like a casino brings in drug dealers, addicts, and a market for prostitution. Please honestly study the impacts of crime around large casinos and how that will affect the entire residential family community, churches, schools, and parks that surround this proposed site.

Children exposed to undesirable people at Esposti Park – Esposti Park is across the street and less than 50 feet from this proposed site. It is used by neighborhood families

for recreation and sports leagues for children. If the other large casino in Sonoma County is any predictor, drug use, guns and violent crime are rampant near a casino. This park will attract drug users, prostitution, and property crime, including those who may have firearms. This will make the park unsafe for the families that live in this neighborhood. Please study the data on the impact of putting a large casino that draws this many people, directly into a family neighborhood.

Cultural Resources – This property contains Sonoma County historical resources that once gone, can never be replaced. This property is zoned Valley Oak habitat in the Sonoma County General Plan. Few of these habitats remain. Please study the destruction of this habitat and the long-term effects on erosion, flooding, wildlife and the aesthetics of this area.

Dam Failure – According to the Dam Failure Inundation Map from the 2016 hazard Mitigation Plan, this property lies in a failure zone. <https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Pre-2022/Department%20Information/Cannabis%20Program/Documents/Dam-Failure-Inundation.pdf>

Please study the risk to customers on this site from dam failure due to earthquake, flood or other trigger events.

Drunk Drivers - The Graton Resort & Casino is named more frequently in CHP reports than any other single business in Sonoma County. About 38 percent of respondents arrested coming from Rohnert Park, or 72 people during the three-year period, said they had their last sip in the casino just outside the city's western edge. The ready availability of alcohol at casinos is a catalyst for increased drunk driving and increased alcohol related traffic fatalities. Please investigate the impact of increasing drunk drivers in a residential family neighborhood/community.

Drought – 2022 is the third year in a historic drought for this area and is part of the fire risk of this area. The drought continues to escalate and intensify affecting fire, and the water table. All residents in Sonoma County are on mandatory water rationing. A recent study found that this is the worst drought in 1200 years. All residents and businesses are affected by the drought. Please study the risk to the community from drought and the impact of placing a casino business that consumes massive amounts of water out of the local aquifer in this area.

Detrimental to Community – In no land use plan in Sonoma County would you bring a business such as this, or the volume of people into a high risk for fire area, or a

residential family neighborhood. The risks are many. Loss of local business, death by fire and inability to evacuate, destruction of local resources such as wildlife, creeks and endangered Valley Oaks, the on-going and increasing drought, drunk drivers, bankruptcies that a business that promotes vice brings to communities. This is the wrong location for a business like this. Please study the true impact this will have on the residents and local businesses that are already here.

Earthquake Risk – The Healdsburg Fault runs parallel to Faught Road which is next to this parcel. Additionally, as per the Sonoma County Hazard Mitigation Plan, the entire Shiloh Road and Redwood Hwy Area is an area of moderate susceptibility to liquefaction during a quake. Please study the impact of earthquake risk to the neighborhood and potential customers of this proposed project.

Economic Loss – This entire community is struggling economically due to the pandemic and the increasing inflation. Bringing a business of this magnitude into this community will further devastate local businesses. Please do a thorough evaluation of the true impact to the local economy, including taking business away from the actual indigenous tribes of Sonoma County, by this outside group.

Fire Evacuation Routes – Historically this area has regular wildland fires. In the past 5 years, two of the worst urban/wildland interface fires have swept through this area, the Tubbs Fire in 2017 in which 26 people died, and the Kincade Fire which was ultimately stopped by firefighters from all over the western United States directly across the road from this proposed site. Mandatory evacuations from both fires caused massive gridlock with the current population. This proposed project could potentially more than double the number of people using the evacuation routes during the next evacuations. These fires move quickly and can happen at any time of the day or night. This type of business operates 24 hours a day seven days a week. Please study the impact of adding an additional 27,000 or more people to this evacuation route which all leads to Highway 101 which is currently at capacity. Expansions to this freeway take decades to complete.

Fire Danger Increase – As more people are put into the wildland, urban interface the dangers from fires increase. Curb and gutter fires used to be unheard twenty years ago and now they happen all year long in this area. Please study the effects of adding additional people into this area 24/7 and how that affects all aspects of the fire danger. Local fire officials have determined that neighborhoods surrounding the proposed casino project were saved from fire damage by vineyard greenbelts, including the vineyard at the proposed casino site. Vineyards create a firebreak. Please study the increased fire risk to the community caused by the removal of the vineyard.

Fire Risk to Residential Neighborhood/Mobile Home Park and Churches – The risk from fire cannot be overstated. It is a basic fact of life that all residents in this area live with and plan for every day.

Fire Danger and loss of vineyards – The Kincade Fire was stopped due in large part to the vineyards that buffer the existing neighborhoods from the wildfires in the Mayacamas Mountains. Any loss in these vineyards increases the fire danger as evidenced by the Tubbs Fire impact on the Mark West and Larkfield neighborhoods to the south of this proposed project site. Please study how the removal of any of the vineyards will affect the existing residential community during the next fire.

Fire Risk to Casino Customers – This is an unsuitable site due to the historic and devastating history of fire in this area. Evacuations are gridlocked and in the case of the Tubbs fire, impossible due to fire closing the only exit route, highway 101. If customers of the casino cannot evacuate due to gridlock and fast wind driven fire, they could die at the casino. This would be bad press for the tribe as well as devastating to their families. If residents die because they can no longer evacuate, bad press as well. There is no sheltering in place during these events. Evacuation is mandatory. Please research the Tubbs and Kincade fires and how quickly they moved, how the evacuation of residents went and then number of people and the way they died in the Tubbs fire and ascertain the effect and probability of potential death to customers.

Floodway- In prior years, Pruitt Creek has overflowed onto Shiloh Rd. and the site of the proposed casino project. The proposed casino site would replace undeveloped permeable farmland. Please study the impact any changes in elevations in the surrounding land will have on flood hazards. Please study the impact of potential flood hazards caused by structures, roadways and parking areas replacing farmland. Please study the impact on the groundwater supply that will be caused by water runoff.

Fox/Hawks/Bobcats- (wildlife)- The proposed casino site and an adjacent vineyard border 800-acre Shiloh Regional Park. Coyote, fox, possum, skunk, racoon, bobcats and a variety of reptiles and amphibians venture into the vineyard and Pruitt Creek in search of food and water. Pruitt creek is designated a critical habitat as an essential fish habitat and habitat for protected salmonids. Please study the impact the casino project will have on Pruitt Creek and the fish habitat, salmonids and other wildlife.

Greenhouse gases- There will be significant greenhouse gas emission during the long-term construction project. There will also be permanent greenhouse gas emissions from

the guest vehicles, delivery trucks and daily facility operation. Please investigate the size and scope of the casino project, including the type and volume of equipment to be used and the impact of the greenhouse on the community and environment.

Groundwater contamination- Various elements of this project from construction, underground pipes, onsite wastewater treatment facility and other sources can cause varying degrees of groundwater contamination. Please study the potential adverse effects from contamination to groundwater from these sources including the impact on individuals and agricultural users of common well water and the effects on the aquifer.

Hazardous materials- The proposed casino project is surrounded by residential neighborhoods, churches, schools, and parks. Any ecological problem will impact a large population. Please investigate all plans and phases of development and construction for use of any hazardous emissions/materials/gases/compounds. Please investigate what, if any, hazardous emissions/ materials/gases/compounds will result from the daily operation of the proposed casino project.

Home sales/home values- Several homeowners have been told by prospective buyers that they were no longer interested because of the proposed casino project. Real estate brokers have advised that the casino project is a negative disclosure impacting sale and pricing. One residential neighborhood is directly across the street, 50 feet from the proposed casino project. Please study the impact the casino project will have on local home values and marketability. Please study how housing values will be impacted by the transformation of the area from rural residential/agriculture to commercial/industrial. Please study how decreases in home values will affect homeowners.

Inappropriate scope of project – The scope of this project, the size of buildings, number of customers, workers and deliveries is too large for this area for infrastructure to support, and compatibility with a residential neighborhood. Please study the impacts of adding all of these additional vehicles and people to the roads and freeway, groundwater, and ability for the community to thrive. Please investigate the accuracy of the description of the Project Location.

Infrastructure roads- All roads in all directions from the proposed casino site are one lane roads without the option for widening. There is residential housing and a church going west along single lane Shiloh Road from the proposed casino project to US 101. Old Redwood Highway going both north and south is one lane in each direction. Please study what the impact on existing roadways will be from the guests, delivery trucks and

buses visiting/using the property daily. Please study what impact on existing roadways will be from creation of any proposed ingress or egress locations at the proposed site.

Inappropriate Scope of Project- The casino project includes a 400-room hotel. This is twice the size of the current largest hotel facility in Sonoma County, Graton Rancheria. In addition, plans call for a casino, spa and convention center. This project would be one of the largest, if not the largest, entertainment facility in the county and would be situated in a residential neighborhood. Please study the impact this proposed project will have on existing infrastructure including roads, law enforcement, traffic, pollution. Please study the long-term impact in transforming the surrounding community from rural residential to urban commercial. Please study the impact to residents in placing a large commercial venture within 50 feet of current residents' homes.

Lack of power/outages-There are regular power outages during high usage in the PG&E service area for the casino project and surrounding homes and businesses. Please study the impact of the casino project's electrical usage on the PG&E facility/facilities providing electricity. Please study the impact of the casino project's power usage on the surrounding homes/businesses in the same service area.

Land Use- This is an improper modification of the environment and is totally out of character with the local environment. The casino project will be replacing undeveloped farmland with concrete and heavy commercial activity. Projections are in excess of 20,000 visitors a day plus employees, vendors, delivery drivers, etc. Please study the impact in this complete modification of land use on the casino project site.

Loss of Open Space- The proposed casino site is on open space land that is designated as critical habitat, essential fish habitat and provides essential habitat for other animals. Please study the impact of the casino project construction on the animal and plant life/habitat on the casino site. Please study the impact of the casino project construction on the animal and plant life/habitat on the area surrounding the casino project, including Shiloh Regional Park. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the casino site. Please study the impact of the casino project's long term day-to-day operation on the animal and plant life/habitat on the area surround the casino project, including Shiloh Regional Park.

Mudflow evacuation- The National Weather Service recently has declared that wildfires will have lasting effects on the landscape and create a heightened risk of flooding for years to come. Locations that are downhill and downstream from burned areas are highly susceptible to Flash Flooding and Debris Flows. The proposed casino project is at

the base of the Mayacamas mountains severely burned by recent fires and an area that is constantly in a red flag warning for critical fire risk. Please study the potential for mudflow damage on the casino project site caused by the casino project's alteration of the land. Please study the potential for mudflow damage to the surrounding homes, roads and businesses by the casino project's alteration of the land.

Negative Ecological Impact- Land development impacts the physical environment in many ways such as overuse of resources, pollution, burning fossil fuels, and foliage and tree removal. Changes like these have triggered climate change, soil erosion, poor air quality, and overall ecology degradation of the surrounding area. Please study the overall impact of the casino project construction on the surrounding ecology. Please study the overall impact of the casino project proposed day to day operation on the surrounding ecology.

Neighborhood events- The several local neighborhoods surrounding the proposed casino project each have regular, organized indoor as well as outdoor activities (4th of July, Memorial Day, etc.), including block parties on the surrounding streets. Please study the impact of the casino project on local organized activities in the surrounding neighborhoods. Please study the impact of the casino project on local organized activities at Esposti and Shiloh Parks.

No significant connection to the land by Koi- The Koi Tribe has been and is a Clearlake County Native American Tribe. The Sonoma County Board of Supervisors found no significant historical connection of the Koi tribe to s Sonoma County. The Koi have tried twice before in Vallejo County and Oakland County. This is the third county they have tried outside of their historical land in Clearlake. The Koi have repeatedly ignored the Indian Gaming Regulatory Act. Please investigate the Koi Tribes historical connection to Sonoma County.

Noise Pollution- Noise pollution is generally defined as regular exposure to elevated sound levels that may lead to adverse effects in humans or other living organisms. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Please investigate what noise levels will be during construction of the proposed casino project. Please study what the impact the noise levels during construction will have on local residents' health. Please investigate what noise levels will be during day-to-day operation of the proposed casino project. Please study what the impact the noise levels during day-to-day operation will have on local residents' health.

Land resources/Geology/Soils- The casino project will require extensive grading and disruption to the current geology. Please study what the impact will be to the local environment caused by site grading and development. Please study what the impact will be to residents from grading and development on the proposed casino site.

Light pollution- The effects of light pollution on people and animals are numerous and are becoming more known over time. Light pollution alters and interferes with the timing of necessary biological activities for birds, bats, amphibians, etc. Please study what the impact of lighting at the proposed casino site will have on native wildlife

Local Indigenous Tribes- The five local indigenous tribes in Sonoma County have unanimously banded together in opposition to the proposed casino project. The Sonoma County Board of Supervisors unanimously passed a resolution in support of the local tribes and opposing the casino project. The town of Windsor also passed a resolution opposing the project. One local indigenous tribe has a casino resort 15 minutes away and another local tribe operates a casino 20 minutes away. Please study the impact that this casino project will have financially on local indigenous tribes. Please study the impact of the proposed casino site on the finances of the individual tribe members.

Residential density- The Project Description and Location in the Notice of Preparation of EA/TEIR Report states that the proposed casino project is bordered on the south and east by agricultural and commercial parcels. This is inaccurate. There are two large residential communities on the east side as well as a mix of residential and light commercial to the south. Please investigate the accuracy of the description of the Project Location.

Residential Neighborhoods – Existing residential neighborhoods begin less than 50 feet from this proposed site. Bringing the massive increase in traffic, noise, light, air pollution, and the usual and known increase in crime such as break-ins, theft, drugs and prostitution directly into existing family neighborhoods will corrupt the social fabric, property values and ability to live a peaceful life. Please study the data on all these impacts and all mitigation measures.

Staffing challenges in this area – In Sonoma County, vacancies exist in about 12% of the workforce. In Windsor many businesses are closing early due to lack of staffing. This project proposes to need 1100 employees. This will deplete the pool for existing

businesses in this area and cause devastation for many local businesses. Please investigate the impact of this project on local businesses.

US Highway 101 impact- US highway 101 has become increasingly congested and now experiences traffic slowdowns and stoppage daily. During emergency evacuations in 2017 and 2019 traffic on US 101 was stop and go because of the volume of cars. Please study how traffic on US 101 will be impacted by the Casino Project (guests, employees, vendors, etc.) daily and in the event of an emergency evacuation. Please study the impact on surrounding road infrastructure in light of the significant increase in traffic.

Water rationing- The project application identifies existing and proposed on-site wells for the project's water supply. Residents in surrounding neighborhoods are under mandatory water rationing with notices from state and local water agencies that further rationing is forthcoming. Because of ongoing and projected worsening drought conditions, the long-term projection is that restrictions and rationing will worsen, and wells will dry. Please investigate what, if any, restrictions will be placed on water use at the proposed casino site. Please study what the impact of the proposed casino project's water use will have on residents and wells.

Well-being- The casino project will be replacing 68 acres of vineyards. There are two residential neighborhoods, a large mobile home park, a church and a busy regional park directly across the street from the proposed casino project. The east side of US 101 is an almost exclusively quiet, residential/agricultural area divided from an industrial area on the west side of US 101 by the freeway. Please study the impact the casino project will have on residents by introducing a high-density urban use into a rural residential neighborhood. Please study the impact noise and light pollution will have on residents.

Youth Sport Leagues- Esposti Park is home to youth football league tryouts and team practices as well as little league and softball league practices and regular season games. During the seasons parking and foot traffic overflow onto adjacent roadways. Please study the impact of increased traffic from the casino project on park use during sports season; in particular, safety to children and park users and available parking caused by any road changes and increased traffic.

Thank you for considering my comments,

Brian Williams

PO Box 61

Duncans Mills, CA 95430

From: Marquel Abend
Sent: Tuesday, June 28, 2022 6:17 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Subject: Koi Nation Shiloh Resort and Casino Project

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way, Sacramento, CA 95825

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

Thank you for considering my comments.

Marquel Abend
2523 Sonoma ave Santa Rosa ca 95405

From: David Jacquin

Sent: Tuesday, June 28, 2022 2:55 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project, attn. Amy Dutschke

Dear Director Dutschke,

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on the Friday before a federal holiday, does not meaningfully allow for full public review. This proposal will significantly affect the quality of the environment and should undergo a full EIS analysis with enough time for the public to meaningfully participate at each stage of the process.

I would also add that the negative impacts of the casino warrant extreme concern, especially the traffic impacts during a wildfire evacuation and water use impacts during a time of severe drought.

Thank you for considering my comments.

All the best,
Dave

David Jacquin
Managing Director

North Point
580 California Street
Suite 2000
San Francisco, CA 94104

PACIFIC REGIONAL OFFICE
BUREAU OF INDIAN AFFAIRS
2022 JUN 29 AM 8:28

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

August 21, 2022

To: Bureau of Indian Affairs, Pacific Region
Re: Comments on Proposed Koi Nation Shiloh Resort
and Casino Project

To Whom It May Concern:

I am writing to provide scoping comments on the proposed Koi Nation Shiloh Resort and Casino Project. To begin with, I would ask that the BIA extend the public comment period and take additional steps to allow the public to participate more fully in the NEPA review process. Providing only 30 days for public comment of such a significant federal action, with a comment period that opens on a Friday before a federal holiday, does not meaningfully allow for full public review.

This proposal will significantly affect the quality of the environment, and should undergo a full EIS analysis with enough time for the public to participate at each stage of the process.

Taking into account the location of the other Northern California casinos — please study the location of the other 4-7 casinos in Northern California and identify casino resorts that are:

- a) built in locations surrounded by long established communities of residential neighborhoods, in areas specifically zoned for residential/agriculture use only and not for commercial use, where development is regulated for the benefit of all the residents of the County.
- b) There are 3 casinos within a 30 mile distance along Highway 101 (15 min. drive between casinos). If built the Shiloh Resort traffic will bottleneck traffic not only on Highway 101 but also on Old Redwood Highway. It will make it difficult to separate casino resort traffic from local business and residential traffic. During Fire Evacuations Old Redwood Hwy. is an alternate route for residents to vacate the county & town of Windsor.
- c) The size and dominance of a gambling casino resort at this location will dominate the landscape and residential life activities, overwhelm the resources of the public services, Esposi Park and Shiloh Regional Park, and impose its increased traffic on the entire community of neighborhoods from Windsor to Santa Rosa.
- d) Water rationing is also a major concern with respect to the building of a major casino resort.

Thank you for considering my comments.

Rene Bloom

Carol Bloom

1045 Elsbree Lane

Windsor, CA 95492